

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DISTRICT**

In Re:

JOSEPH DuMOUCHELLE FINE
& ESTATE JEWELLERS, L.L.C.

Case No. 19-56239

Chapter 7

Hon. Lisa S. Gretchko

Debtor,

**FIRST APPLICATION OF SCHAFFER AND WEINER, PLLC, COUNSEL FOR
DEBTOR FOR FEES AND REIMBURSEMENT OF EXPENSES FOR SERVICES
RENDERED IN ADVERSARY PROCEEDING NO. 21-04023**

SUMMARY COVERSHEET

Date of Current Fee Application and Period Covered	Total Fees/ Expenses Requested
Period: July 14, 2020 – July 19, 2023	Fees: \$293,883.50 Expenses: \$ 2,781.73

Name of Professional/ Paraprofessional	Title	Year Admitted to Practice	Hourly Rate	Total Hours (Current Application)	Total Fees
John J. Stockdale, Jr.	Partner	2004	390.00	0.60	234.00
John J. Stockdale, Jr.	Partner	2004	430.00	0.10	43.00
Kim K. Hillary	Partner	2004	345.00	130.90	45,160.50
Kim K. Hillary	Partner	2004	360.00	66.10	23,796.00
Kim K. Hillary	Partner	2004	385.00	29.20	11,242.00
Michael E. Baum	Partner	1978	495.00	0.50	242.50
Jeffery J. Sattler	Partner	2009	330.00	5.30	1,749.00
Joseph K. Grekin	Partner	1995	395.00	72.30	28,558.50
Joseph K. Grekin	Partner	1995	410.00	149.50	61,295.00
Joseph K. Grekin	Partner	1995	450.00	54.30	24,435.00
Daniel J. Weiner	Partner	1980	485.00	3.90	1,891.50
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Daniel J. Weiner	Partner	1980	590.00	10.90	6,431.00
Brandi M. Blasses	Associate	2019	280.00	114.20	31,976.00
Brandi M. Blasses	Associate	2019	290.00	191.10	55,419.00
Paralegal-NM			160.00	3.40	544.00
Paralegal-NM			170.00	2.70	459.00
Law Clerk - DP			160.00	1.00	160.00
TOTAL FEES				836.50	\$293,883.50
Blended Attorney Rate (excluding paraprofessionals)			\$352.93		

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DISTRICT**

In Re:

JOSEPH DuMOUCHELLE FINE
& ESTATE JEWELLERS, L.L.C.

Case No. 19-56239
Chapter 7
Hon. Lisa S. Gretchko

Debtor,

**FIRST APPLICATION OF SCHAFER AND WEINER, PLLC, COUNSEL
FOR TRUSTEE FOR FEES AND REIMBURSEMENT OF EXPENSES FOR
SERVICES RENDERED IN ADVERSARY PROCEEDING NO. 21-04023**

Schafer and Weiner, PLLC, (“Applicant”), counsel for Mark H. Shapiro (the “Trustee”), for its *First Application for Fees and Reimbursement of Expenses for Services Rendered in Adversary Proceeding No. 21-04023* (the “Fee Application”) states:

I. Statement of Fees Request

1. Applicant requests approval of fees in the amount of \$293,883.50 for services rendered during Adversary Proceeding No. 21-04023 (the “Adversary Proceeding”).¹

¹ This is not a final fee application because the Applicant also rendered services in the main bankruptcy case. The Applicant is filing this Application, which seeks fees only related to the Adversary Proceeding based on the *Agreement for Assignment of Rights and Proceed Sharing* dated September 2, 2020 and approved by this Court at Docket No. 198 (the “Assignment Agreement”). The Assignment Agreement provides that the Applicant is entitled to payment for its allowed fees generated in connection with its pursuit of the claims brought in the Adversary Proceeding from

2. Applicant requests reimbursement in the amount of \$2,781.73 for expenses incurred during the Adversary Proceeding.

3. Applicant received a \$10,000 retainer in this case from William Noble Rare Jewels, LP (“Noble”) pursuant to the Assignment Agreement.

II. Time period during which services were rendered

4. The Fee Application covers the period from July 14, 2020 through July 19, 2023 (the “Application Period”).

III. Narrative Summary of Services Provided and Benefit to the Estate

THE INVESTIGATION AND THE COMPLAINT

5. Prior to the Petition Date, the Debtor operated a jewelry store and accompanying business of buying and selling jewelry.

the amounts recovered from the Adversary Proceeding (the “Adversary Proceeding Proceeds”) before subsequent distribution to the Estate and to Noble (defined therein). See Assignment Agreement, Exhibit 1. In contrast, fees unrelated to the Adversary Proceeding are not recoverable from the Adversary Proceeding Proceeds until after they are distributed to the Estate in accordance with the Assignment Agreement. As a result, fees the Applicant charged related to the Adversary Proceeding have a substantially different priority than fees unrelated to the Adversary Proceeding.

While the Applicant does have substantial unpaid fees unrelated to the Adversary Proceeding, it is possible that the Applicant will not file a separate fee application for fees because it appears unlikely that the Estate will have the money to pay them.

6. The Debtor's creditors filed an involuntary bankruptcy petition against the Debtor on November 17, 2019 ("Petition Date") [DN 1, Main Case]. The Court entered its Order for Relief Granting Involuntary Petition on December 16, 2019 [DN 31, Main Case].

7. The Trustee was appointed as Interim Chapter 7 Trustee of the Debtor's bankruptcy estate (the "Estate") on November 27, 2019 [DN 52, Main Case].

8. The Trustee subsequently investigated whether the Estate had causes of action against various parties who received transfers from the Debtor prior to the Petition Date.

9. The Applicant assisted the Trustee in this investigation by reviewing financial and other documents of the Debtor. The Applicant also spoke to representatives of the Debtor's principal and certain creditors and coordinated with the Trustee.

10. The Trustee concluded after his investigation that Zeidman's Jewelry and Loan of Michigan, Inc. or one of its related entities (collectively, the "Defendants") received jewelry from the Debtor without paying reasonably equivalent value in the 90 days prior to the Petition Date.

11. The Applicant extensively researched causes of action based on the Trustee's investigation and drafted the adversary proceeding complaint (the "Complaint") against Defendants on the Trustee's behalf.

12. Prior to filing the Complaint, the Applicant drafted a demand letter which the Applicant sent to the Defendants' counsel. The demand letter did not produce useful settlement discussions.

13. As a result, the Applicant filed the Complaint on the Trustee's behalf on December 17, 2020, and subsequently served the Defendants [DN 1]². The Complaint contained counts alleging that the Defendants fraudulently transferred certain jewelry (the "Jewelry"), that the Defendants were liable for statutory and common law conversion of the Jewelry and/or aiding and abetting the conversion of the Jewelry, and that the Trustee was entitled to the delivery of the Jewelry through claim and delivery.

MOTION TO DISMISS AND ADDITIONAL PLEADINGS

14. The Applicant filed and responded to several motions on the Trustee's behalf during the Adversary Proceeding.

15. On March 8, 2021, in response to the Complaint, the Defendants filed a Motion to Dismiss [DN 11]. The Motion to Dismiss requested that the Adversary Proceeding be dismissed based on the argument that the Estate lacked a perfected lien under the Uniform Commercial Code, that title to the Jewelry had passed to the

² Unless otherwise specified, all references to a docket number ("DN") shall be a reference to the Adversary Proceeding docket.

Defendants, and that the Estate was barred from recovery based on the wrongful conduct rule.

16. The Applicant did extensive research on each of these issues and filed a lengthy response to the Motion to Dismiss [DN 16].

17. The Defendants filed a reply brief [DN 22] which the Applicant reviewed and researched. After reviewing the Defendant's reply brief, the Applicant drafted and then filed a motion for permission to file a sur-reply brief [DN 25], which was granted.

18. As a result of the Applicant's work, the Motion to Dismiss was denied.

19. The Applicant subsequently filed an Amended Complaint [DN 38] to further address the issues the Defendants raised in their Motion to Dismiss.

20. The Defendants responded to the Amended Complaint by filing an Answer and Affirmative Defenses [DN 41] which the Applicant reviewed and analyzed.

INITIAL DISCLOSURES AND DISCOVERY

21. The Applicant worked with the Defendants to draft and file a report with this Court in accordance with Fed.R.Bankr.P. 7026(f) [DN 103], and as amended at [DN 107]. The Applicant represented the Trustee in the subsequent scheduling conference with the Court.

22. The Applicant drafted and filed initial disclosures in accordance with Fed.R.Bankr.P. 7026(a) [DN 55]. The Applicant also reviewed the Defendants' initial disclosures.

23. The Defendants served extensive discovery requests on the Trustee, which included a First Set of Interrogatories and a First Request for Production of Documents (together, the "Defendants' First Discovery Requests") [DN 51 and 52]. The Applicant assisted the Trustee in responding to the Defendants' First Discovery Requests and producing the requested documents and filing the Certificate of Service [DN 60].

24. The Defendants' counsel subsequently sent correspondence to the Applicant arguing that the Trustee's responses to the Defendants' First Discovery Requests were inadequate. The Applicant responded to the letter on the Trustee's behalf. The Applicant met and conferred with the Defendants' counsel over the telephone, during which the Trustee's responses were discussed at length.

25. The Defendants subsequently filed an unusually complicated twenty-two-page long Motion to Compel related to the Defendants' First Discovery Requests [DN 62].

26. The Applicant filed a brief in response to the Motion to Compel on the Trustee's behalf [DN 65]. Applicant subsequently reviewed the Defendants' reply

brief [DN 70] and prepared oral argument and represented the Trustee at the hearing on the Motion to Compel, which was granted in part and denied in part.

27. The Applicant subsequently assisted the Trustee in revising his responses to certain of the Defendants' First Discovery Requests in accordance with the Court's order on the Motion to Compel.

28. The Applicant also served discovery requests on the Defendants on the Trustee's behalf, including a First Set of Interrogatories, Document Requests, and Requests for Admissions (the "Trustee's First Discovery Requests") [DN 61]. The Defendants filed responses to and produced documents in response to the Trustee's First Discovery Requests, which the Applicant reviewed and analyzed [DN 63].

29. The Applicant drafted correspondence to Defendants on the Trustee's behalf setting forth in detail each of the ways in which the Trustee believed that the Defendants' responses to the Trustee's First Discovery Requests were inadequate and not in accordance with the Federal Rules of Bankruptcy Procedure. The Applicant subsequently met and conferred with the Defendants' counsel related to the Defendants' responses to the Trustee's First Discovery Requests. The Defendants supplemented their discovery responses to address the issues the Applicant raised and the Applicant reviewed and analyzed the supplemental responses received from the Defendants.

30. The parties subsequently participated in substantial additional discovery. The Defendants served a First Set of Requests for Admission to Plaintiff [DN 110], a Second Set of Interrogatories to Plaintiff [DN 111], a Second Request for Production of Documents to Plaintiff [DN 112], a Third Set of Interrogatories to Plaintiff [DN 175], and a Third Request for Production of Documents to Plaintiff [DN 176]. The Applicant assisted the Trustee in responding to all of these discovery requests and in producing the requested documents.

31. The Applicant also drafted the Plaintiff's Second Discovery Requests to Defendants and Request for Admissions [DN 120] and the Plaintiff's Third Interrogatories and Third Request to Produce to Defendants [DN 121]. The Applicant served these discovery requests on the Defendants, reviewed the responses to the requests, and reviewed the documents produced.

ADDITIONAL MOTIONS

32. After reviewing the Defendants' responses to certain of the Trustee's First Discovery Requests, the Applicant drafted and filed on the Trustee's behalf (1) a Motion for Possession Pending Final Judgment [DN 78/79] ("Possession Motion"), and (2) a Motion Requesting Adverse Inference Due to Spoliation of Evidence [DN #75] ("Adverse Inference Motion").

33. The Defendants filed responses to both motions [DN 87 and 88].

34. The Applicant reviewed and analyzed the Defendants' responses and prepared oral argument and participated in the hearings on the Possession Motion and the Adverse Inference Motion.

35. In response to the Court's ruling and suggestions on the Possession Motion, the Applicant drafted and negotiated with the Defendants the terms of a Stipulated Order which required certain jewelry to be kept in a safety deposit box for the duration of the litigation [DN 119].

36. The Court held there were questions of fact related to the Adverse Inference Motion, entered a scheduling order for discovery, and set the matter for an evidentiary hearing [DN 122].

37. The Applicant subsequently drafted Plaintiff's Request for Admission, Interrogatories and Requests to Produce Re: Trustee's Motion Requesting Adverse Inference Due to Spoliation of Evidence and served the requests on the Defendants [DN 108].

38. Defendants responded to these discovery requests and produced documents.

39. The Applicant reviewed and analyzed the Defendants' responses to these discovery requests, including the documents the Defendants produced.

40. The Defendants served the Trustee with their First Requests for Admission, First Interrogatories, and First Requests for Production of Documents to

Plaintiff re: Motion Requesting Adverse Inference Due to Spoliation [DN 115, 116, and 117]. The Applicant assisted the Trustee in drafting responses to these discovery requests, and reviewed and produced the documents the Trustee believed were responsive to the requests.

EXPERT WITNESS AND REPORT

41. The Applicant met with the Trustee and determined that retention of an expert witness was necessary to assist with a determination of value of the Jewelry and to advise the Trustee on issues related to the jewelry business. The Applicant sought numerous leads to secure an expert qualified to advise the Trustee in this case and was ultimately introduced to Charles Kuperwasser (“Mr. Kuperwasser”).

42. The Applicant drafted an application to employ Mr. Kuperwasser [DN 232] and sought the concurrence of the United States Trustee’s Office which was granted.

43. The Applicant met with Mr. Kuperwasser on numerous occasions to inform him about the history of the case and the factual and legal issues in the case, and to seek his input regarding issues related to the Jewelry and the jewelry business.

44. The Applicant assisted Mr. Kuperwasser in drafting his preliminary expert report which the Applicant then used to support the Trustee’s claims relating to the spoliation issue, fraudulent transfer issues and other issues in dispute in the case.

MEDIATION, NEGOTIATIONS, AND SETTLEMENT

45. The litigation of this case was delayed due to difficulties obtaining documents. Joseph DuMouchelle, who controlled the Debtor prior to the Petition Date, was under federal indictment, and the Department of Justice had seized the Debtor's business records. The Applicant negotiated the terms of a stipulation to mediate the Adversary Proceeding during the delay, and to postpone certain discovery and litigation deadlines to do so [DN 140].

46. To prepare for mediation, the Applicant drafted a Mediation Brief and continued to assist Mr. Kuperwasser to draft a preliminary expert report.

47. The Defendants filed a mediation brief which the Applicant reviewed, researched and analyzed in preparation for the mediation. The Applicant also discussed the Defendants' mediation brief with the Trustee and Mr. Kuperwasser (the Defendants' mediation brief referred extensively to the findings of the Defendants' expert witness, which were set forth in a report that was not attached to the brief but was provided to the mediator).

48. Mediation took place on July 20, 2022. The Applicant represented the Trustee at the mediation. The mediation took an entire day, but the parties did not reach a settlement at the mediation.

49. The parties did, however, continue to negotiate after mediation. The parties exchanged several detailed correspondences and conducted several phone

calls attempting to bridge the gap between their settlement positions. The Applicant represented the Trustee in these extensive negotiations.

50. After three months of negotiations, the parties requested that the Court provide an additional extension of the discovery period and certain litigation deadlines to allow the parties to assess the value of a particular piece of jewelry referred to as the Oval Diamond Ring in order to assist the parties in settlement negotiations.

51. The Applicant negotiated the terms of the proposed stipulation, represented the Trustee at the hearing related to the proposed stipulation, and drafted changes to the stipulation ordered by the Court.

52. This Court entered the stipulated order on November 8, 2022 [DN 186]. The Applicant then assisted the Trustee in arranging for the Oval Diamond Ring to be removed from the safety deposit box in which it had been kept since this Court's order related to the Trustee's Possession Motion, transported to New York, examined by the Gemological Institute of America, valued by the Trustee's expert, transported back to Michigan, and returned to the safety deposit box.

53. After the valuation of the Oval Diamond Ring, the parties engaged in additional settlement negotiations, in which the Applicant represented the Trustee.

54. After several more weeks of negotiations in which the Applicant represented the Trustee, the parties eventually reached a settlement in principle. The

Applicant subsequently drafted a proposed settlement agreement and a proposed motion to compromise the claims against the Defendants. The Applicant negotiated the terms of these documents with the Defendants' counsel on the Trustee's behalf. The parties exchanged several drafts of both the proposed settlement agreement and the proposed motion.

55. During the process of negotiating the settlement agreement, the Defendants requested that as part of the settlement Noble sign the settlement agreement between the Trustee and the Defendants and release any claims against the Defendants. The Defendants proposed that Noble's release and signature on the settlement agreement be made a term of the settlement.

56. In response, the Applicant approached Noble's counsel on the Trustee's behalf in an effort to secure his release.

57. In return for his release, Noble sought to re-negotiate the payment waterfall in the Assignment Agreement.

58. The Applicant assisted the Trustee in negotiating with Noble related to the proposed modification of the waterfall under the Assignment Agreement. The Applicant analyzed various proposals from Noble, discussed these proposals with the Trustee, and communicated counter-proposals to Noble's counsel.

59. The Applicant was eventually able to assist the Trustee in obtaining an agreement with Noble to modify the Assignment Agreement in a manner acceptable

to both Noble and the Trustee, and secured Noble's agreement to execute the proposed settlement agreement.

60. After successfully negotiating this three-party settlement, the Applicant revised the proposed motion to compromise and the accompanying proposed order to incorporate the terms of the modification of the Assignment Agreement and obtained the approval of the form of the motion and the order from both the Defendants and Noble.

61. As a result of these negotiations the Applicant ultimately filed the motion to compromise on the Trustee's behalf [DN 293] in the Main Case.

62. Applicant prepared for and participated in a hearing on its motion to compromise and the Court ultimately entered an order approving the settlement [DN 191].

BENEFIT TO THE ESTATE

63. The Applicant's work investigating, drafting, filing and prosecuting and resolving the Adversary Proceeding on the Trustee's behalf (including the pursuit of spoliation and possession issues) benefited the Estate because it resulted in \$330,000 being paid into the Estate in addition to several diamonds and a piece of jewelry with the approximate total value of \$200,000.

64. The agreed-upon proceeds of the Adversary Proceeding and the piece of jewelry have been distributed to Noble in accordance with the Assignment Agreement, as modified by the settlement.

65. The remaining funds, and the proceeds from the sale of the diamonds, will be available for distribution to creditors and for administration of the Estate.

66. Without Applicant's identification, investigation, prosecution, and resolution of the claims against the Defendants, the Estate would not have recovered any of the value from the settlement.

IV. Adversary Proceedings

67. Other than the work performed in the Adversary Proceeding that is the subject of this Application, the Applicant has not represented the Trustee in any other adversary proceeding in this case.

V. Current Status

68. The Debtor's case is open and the Trustee continues to administer the Estate.

69. As a result of the settlement of the Adversary Proceeding, the Estate is in possession of several loose diamonds which the Trustee is required to liquidate. The Trustee intends to liquidate the diamonds as soon as practicable.

70. The Trustee is required to distribute the Estate's assets to creditors according to their priority. This will require the Trustee to review and analyze at

least one additional fee application, that of Mr. Kuperwasser. It may also require the Trustee to object to one or more claims.

71. Once the assets presently in the Estate are liquidated and distributed, the Trustee intends to close the Estate.

VI. Services to Be Rendered in the Future

72. The Applicant does not anticipate providing additional services to the Trustee in connection with the Adversary Proceeding. However, the Applicant may represent the Trustee in his continued administration of the Estate. In particular, the Applicant may represent the Trustee with regard to liquidating and distributing the assets in the Estate.

VII. Amount and Nature of Accrued Unpaid Administrative Expenses

- **Mr. Kuperwasser.** Contemporaneous with the filing of this Motion, the Applicant filed an application for payment of administrative expenses on behalf of Mr. Kuperwasser in the amount of \$8,266.60.
- **Trustee Mark Shapiro.** Upon disbursing the funds in the Estate, the Trustee will be entitled to seek payment of a commission, estimated at \$20,657.99.
- **Steinberg Shapiro & Clark.** Steinberg Shapiro & Clark have estimated unpaid fees and costs in the amount of \$47,000.
- **Subchapter V Trustee.** The Subchapter V Trustee will assert an administrative claim against the Estate, the amount of which is currently unknown.

- **R.J. Montgomery and Associates, Inc. (“RJ”).** RJ will asserted an administrative claim against the Estate in the amount of \$3,908.14 [DN 263, Main Case], which claim was allowed by order of the Court [DN 271, Main Case].
- **Wesler & Associates CPA, PC (“Wesler”).** The Trustee has filed two fee application on behalf of his accountant, Wesler, in the total amount of \$4,053.18. [DNs 264 and 285]. The Court granted these fee applications [DNs 268 and 288].
- **Schafer and Weiner, PLLC.** In addition to the fees requested in this Application, the Applicant may assert additional administrative claims against the Estate for work performed on behalf of the Trustee in the Main Case, and for work which Applicant may perform for the Trustee going forward. The Applicant may not assert these claims, however, out of deference to other creditors of the Estate.

VIII. Services of More than One Attorney and Paralegal

73. During the Application Period, there were several instances where more than one attorney or paralegal necessarily met together, attended conferences, or appeared in court in which both charged for their time. Each of these meetings were necessary and either (i) allowed Applicant to utilize the talents of more than one of its attorneys on particularly difficult issues; or (ii) facilitated the delegation of duties to attorneys with lower hourly rates, reducing the overall cost to the Estate. In many, if not most, of these instances, only one of the professionals charged for his or her time and the other professionals did not charge.

IX. Prior Fee Applications

74. There has been no prior fee application filed in this case by the Applicant.

X. No Agreements for Sharing of Compensation

75. No agreements or understandings exist between Applicant and any other person or firm for the sharing of any compensation received for services rendered in this matter other than agreements or understandings relating to the division of compensation among the partners and associates of Applicant.

XI. Trustee's Approval of Fee Application

76. The Applicant provided this Application to the Trustee for his review and the Trustee provided his written approval of the fee Application.

XII. Exhibits in Support of Application

77. In support of this request, Applicant has attached:

Exhibit 1: The proposed order granting the Application.

Exhibit 2: The order appointing Applicant as counsel for the Trustee.

Exhibit 3: N/A

Exhibit 4: A summary of the number of hours and services rendered by each attorney/paraprofessional totaled individually and by category, the hourly rate of each and the blended hourly rate of the professionals (excluding paraprofessionals).

Exhibit 5: A listing of the Applicant's time records which set forth in chronological order each specific service for which an award of compensation is sought pursuant to the Fee

Guidelines promulgated by the United States Trustee Program, 28 C.F.R. Part 58 Appendix, Subparagraph (b)(4) entitled “Project Billing Format.”

Exhibit 6: A brief biography of each attorney who performed services for the Debtors.

Exhibit 7: An itemized statement of expenses for which reimbursement is sought.

WHEREFORE, Applicant respectfully requests that it be awarded the following as final compensation for services rendered in Adversary Proceeding No. 21-04023 under 11 U.S.C. § 330:

Fees – Application Period	\$293,883.50
Costs –Application Period	\$ 2,781.73
Total Final Request	\$296,665.23

Respectfully submitted,

SCHAFER AND WEINER, PLLC

/s/Joseph K. Grekin
Joseph K. Grekin (P52165)
Attorneys for Trustee
40950 Woodward Avenue, Suite 100
Bloomfield Hills, MI 48304
(248) 540-3340
jgrekin@schaferandweiner.com

Dated: July 21, 2023

EXHIBIT

1

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DISTRICT**

In Re:

JOSEPH DuMOUCHELLE FINE
& ESTATE JEWELLERS, L.L.C.

Case No. 19-56239
Chapter 7
Hon. Lisa S. Gretchko

Debtor,

/

**ORDER ALLOWING FIRST APPLICATION OF SCHAFER AND
WEINER, PLLC, COUNSEL FOR TRUSTEE FOR FEES AND
REIMBURSEMENT OF EXPENSES FOR SERVICES RENDERED IN
ADVERSARY PROCEEDING NO. 21-04023**

The Court has reviewed Schafer and Weiner, PLLC's ("Applicant"), as Counsel for the Trustee (the "Trustee"), *First Application for Fees and Reimbursement of Expenses for Services Rendered for Services Rendered in Adversary Proceeding No. 21-04023* (the "Application"), which was filed with this Court pursuant to Sections 330 and 331 of Title 11 of the United States Code (the "Bankruptcy Code"), Fed. R. Bankr. P. 2016, and LBR 2016-1 (E.D. Mich.); Applicant requests an order allowing the fees and reimbursement of costs for services rendered as requested in the Application.

Notice of the Application and the relief requested in the Application has been provided to all creditors and parties in interest required to be served pursuant to Fed. R. Bankr. P. 2002(a)(7); no other parties have filed objections thereto; and the Court being fully advised in the premises;

NOW THEREFORE, IT IS HEREBY ORDERED that the Application is granted and Schafer and Weiner, PLLC, Counsel for the Trustee, is awarded its fees in the amount of \$293,883.50 for services rendered and \$2,781.73 for reimbursement of expenses for a total award of \$296,665.23.

IT IS FURTHER ORDERED that this fee award be awarded as final compensation under 11 U.S.C. §330(a).

EXHIBIT

2

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN**

In Re:

**JOSEPH DuMOUCHELLE FINE
& ESTATE JEWELLERS, L.L.C.**

Debtor

Case No. 19-56239

Hon. Phillip J. Shefferly

Chapter 7

**ORDER GRANTING TRUSTEE'S APPLICATION FOR AUTHORITY TO
EMPLOY SCHAFER AND WEINER, PLLC, AS SPECIAL COUNSEL,
NUNC PRO TUNC TO THE APPOINTMENT DATE**

The Court has reviewed the *Application for Authority to Employ Schafer and Weiner, PLLC as Special Counsel, Nunc Pro Tunc to the Appointment Date*, filed by Schafer and Weiner as proposed counsel to Mark Shapiro, the Chapter 7 Trustee (the "Application"); the Court has read the Application and the supporting Affidavit submitted by Daniel J. Weiner, and the Court being otherwise fully advised in the premises,

NOW THEREFORE, IT IS HEREBY ORDERED that Schafer and Weiner, PLLC, is employed as counsel for the Trustee *nunc pro tunc* to December 16, 2019, pursuant to the terms outlined in the Application.

IT IS FURTHER ORDERED that Schafer and Weiner, PLLC, shall be compensated for its services after proper application is made to, and authorized by, the Court.

Signed on January 21, 2020



/s/ Phillip J. Shefferly

Phillip J. Shefferly
United States Bankruptcy Judge

EXHIBIT

3

N/A

EXHIBIT

4

**SUMMARY OF NUMBER OF HOURS AND SERVICES RENDERED BY EACH
PROFESSIONAL/PARAPROFESSIONAL**

Name of Professional/Paraprofessional	Rate/hour	Hours	Fees
Brandi M. Blasses	290.00	191.10	\$55,419.00
Brandi M. Blasses	280.00	114.20	31,976.00
Daniel J. Weiner	590.00	10.90	6,431.00
Daniel J. Weiner	495.00	0.50	247.50
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Paralegal-NM	160.00	3.40	544.00
TOTAL		836.50	\$293,883.50
Blended Attorney Rate	\$352.93		

EXHIBIT

5

Schafer and Weiner, PLLC
40950 Woodward Ave.
Suite 100
Bloomfield Hills, MI 48304
(248) 540-3340

Invoice submitted to:

July 19, 2023

DUE UPON RECEIPT

Invoice #58640

Professional Services

		<u>Hrs/Rate</u>	<u>Amount</u>
7/14/2020	JG Strategize re causes of action against Zeidman's	0.50 450.00/hr	
	KH Calls with Bill Noble re: claims against Zeidmans and ownership of claims.	0.40 385.00/hr	
	KH Call with Joe Grekin re: potential aiding conversion claims.	0.50 385.00/hr	
9/29/2020	DJW Multiple internal e-mails re: litigation status re: Zeidmans	0.30 590.00/hr	NO CHARGE
10/5/2020	KH Receive, review and respond to email from Cauchi re: claim to jewelry. Follow up email to Trustee re: same.	0.40 385.00/hr	
	JG Strategize re complaint, next steps, factual issues to be addressed	0.40 450.00/hr	NO CHARGE
10/6/2020	KH Call with Bill Noble re: claim against Zeidmans.	0.40 385.00/hr	
	KH Brief research re: conversion claim against Zeidman's.	0.60 385.00/hr	
10/8/2020	KH Call with Patricia @ Noble re: claims against Zeidmans	0.40 385.00/hr	
10/11/2020	KH Call with Joe Grekin re: claims against Zeidmans	0.30 385.00/hr	

		<u>Hrs/Rate</u>	<u>Amount</u>
10/14/2020	KH	Call with Bill Noble, Barren Cass and Gary Hanson re: potential recoveries from Zeidmans.	1.00 385.00/hr
10/19/2020	JG	Strategize re next steps in planned lawsuit, 2004	0.20 450.00/hr
	KH	Begin drafting Complaint re: Zeidmans including review of documents and factual development.	1.90 385.00/hr
	DJW	Review (summary) of Adversary proceedings filings re: filing related matters	0.40 590.00/hr
11/8/2020	KH	Research and continue drafting Zeidman's complaint.	3.80 385.00/hr
11/9/2020	KH	Continue drafting Zeidman's complaint.	3.20 385.00/hr
11/10/2020	KH	Continue drafting Adversary Proceeding complaint.	2.10 385.00/hr
11/12/2020	KH	Call with client re: various claims.	0.30 385.00/hr
11/16/2020	KH	Call with Noble and various jewelers re: lawsuit against Zeidman's.	0.50 385.00/hr
12/1/2020	KH	Call with client re: Zeidman's claims and follow up re: discovery from JD.	0.30 385.00/hr
12/2/2020	KH	Call with Noble and team, re: claim against Zeidmans.	0.20 385.00/hr
12/7/2020	KH	Continue drafting Complaint re: Zeidman's.	1.70 385.00/hr
	JG	Review complaint	0.10 450.00/hr
	NM	Research for K. Hillary re: Ziedman's	1.10 170.00/hr
12/8/2020	JG	Review and assist in revising complaint	1.10 450.00/hr

		<u>Hrs/Rate</u>	<u>Amount</u>
12/8/2020	KH	Continue drafting complaint against Zeidman's.	3.10 385.00/hr
12/10/2020	JG	Review and revise complaint	0.60 450.00/hr
	KH	Call with Joe Grekin re: strategy for Zeidman's complaint.	0.30 385.00/hr
12/17/2020	JG	Assist in finalizing complaint, strategize re overture to Zeidman's	0.30 450.00/hr
1/8/2021	JG	Strategize re settlement negotiations, necessity of filing complaint, next steps	0.30 450.00/hr
	KH	Call with Jason Conti re: response to lawsuit and refusal to turn over jewelry.	0.30 385.00/hr
	KH	Email to Mark re: email from and conversation with Conti re: refusal to hand over jewelry.	0.30 385.00/hr
1/10/2021	JG	Call with Mark re next steps re complaint	0.40 450.00/hr
1/13/2021	KH	Email to Conti re; law regarding security interests.	0.60 345.00/hr
1/20/2021	JG	Strategize re service of complaint, possible motion for possession pending judgment or injunction	0.20 450.00/hr
	KH	Attend to filing of lawsuit.	0.70 345.00/hr
	KH	Strategize re: motion for possession pending final judgment.	0.70 345.00/hr
1/21/2021	KH	Attend to service of Zeidman's complaint.	0.40 345.00/hr
1/22/2021	JG	Strategize re service of complaint, review correspondence re same	0.20 450.00/hr
	KH	Emails to and from J. Conti re: service of complaint.	0.30 345.00/hr

			<u>Hrs/Rate</u>	<u>Amount</u>
1/28/2021	KH	Receive and review notice of improper service of summons, review order, complaint, summons and POS documents, place call to court.	0.30 345.00/hr	
1/29/2021	KH	Call with court clerk re: notice of improper service. Attend to matters re: reissuing summons and serving on registered agent.	0.50 345.00/hr	
	JG	Strategize re deposition strategy re nieces	0.10 395.00/hr	NO CHARGE
2/1/2021	KH	Receive and review email from Amanda Gall with Noble's office re: ownership of consigned jewels.	0.40 345.00/hr	
	KH	Call with Mark Shapiro re: issues related to ownership of jewelry.	0.40 345.00/hr	
	NM	Assistance to KKH re: exhibits for review	0.70 170.00/hr	NO CHARGE
2/2/2021	KH	Research re: ownership and consignment.	0.80 345.00/hr	
	KH	Review Noble records re: consigned jewelry	0.70 345.00/hr	
2/11/2021	KH	Receive and review Stipulation and order regarding deadline to answer complaint.	0.20 345.00/hr	
2/12/2021	KH	Research re: basis for motion for preliminary injunction and/or possession pending final judgment.	3.40 345.00/hr	
2/25/2021	KH	Continue research re: common law conversion and knowledge requirement.	1.50 345.00/hr	
	NM	LEXIS case searches for KKH	0.90 160.00/hr	
3/9/2021	KH	Email to and from client re: Zeidman's suit.	0.20 345.00/hr	
	KH	Begin review of Zeidman's Motion to Dismiss.	1.30 345.00/hr	

3/11/2021	KH	Call with Brandi Dobbs re: wrongful conduct legal argument and research needed.	0.30 345.00/hr
	BB	Phone call with K. Hillary regarding the wrongful conduct rule.	0.20 290.00/hr
	KH	Begin drafting Response to Motion to Dismiss.	0.80 345.00/hr
3/12/2021	JG	Assist in drafting response to motion to dismiss	0.20 395.00/hr
	BB	Research regarding Michigan's wrongful conduct rule.	1.50 290.00/hr
3/15/2021	BB	Draft email memorandum regarding the wrongful conduct rule.	1.00 290.00/hr
	NM	Noble UCC searches in various states	0.90 160.00/hr
3/16/2021	BB	Research regarding the wrongful conduct rule as a question of fact.	1.00 280.00/hr
3/17/2021	KH	Research issues related to Zeidman's Motion to dismiss.	5.30 345.00/hr
3/18/2021	DP	research consignment/bailment/innocent buyer	1.00 160.00/hr
	NM	LEXIS searches, other online searches (per K. Hillary)	1.60 160.00/hr
	KH	Continue research and drafting re: Response to Zeidman's Motion to Dismiss.	6.20 345.00/hr
3/19/2021	KH	Continue drafting of Response to Motion to Dismiss.	6.30 345.00/hr
3/21/2021	KH	Continue researching and drafting response to Zeidman's Motion to Dismiss.	8.10 345.00/hr
3/22/2021	JG	Review motion to dismiss	0.40 395.00/hr

		<u>Hrs/Rate</u>	<u>Amount</u>
3/22/2021	JG	Review and revise response to motion to dismiss	1.20 395.00/hr
	KH	Finalize and file Response to Motion to Dismiss.	3.20 345.00/hr
	JSA	Revise draft of Rule 12(b)(6) response.	1.50 330.00/hr
3/24/2021	KH	Receive and review notice of hearing on Motion to Dismiss, review rules for deadline to file reply brief and availability of sir reply.	0.50 345.00/hr
3/25/2021	KH	Call with Bill Noble re: update on litigation. Follow up email re: same.	0.30 345.00/hr
4/21/2021	KH	Receive and review re-assignment to Judge Gretchko. Send same to client with brief correspondence. Send same to Noble with brief correspondence.	0.40 345.00/hr
4/23/2021	JG	Strategize re need for injunction	0.20 395.00/hr
	KH	Strategize with Joe Grekin re: transfer of case to timing and injunction issues.	0.30 345.00/hr
5/14/2021	DJW	Review status of adversary proceedings with Zeidmans, assets, initiatives and next steps	1.00 485.00/hr
5/19/2021	JG	Preparation for strategy meeting	0.10 395.00/hr
6/9/2021	BB	Review and analyze pleadings related to motion to dismiss.	0.80 280.00/hr
	KH	Review standard for filing Surreply brief	0.40 345.00/hr
6/10/2021	JG	Strategize re hearing on motion to dismiss	0.10 395.00/hr
	BB	Research regarding bailment and consignment.	3.80 280.00/hr
	BB	Draft Motion for Leave to File surreply.	1.00 280.00/hr

		<u>Hrs/Rate</u>	<u>Amount</u>
6/10/2021	BB	Review and revise Motion for Leave to File Surreply and related Surreply.	1.00 280.00/hr
	BB	Various phone calls with K. Hillary regarding surreply and motion for leave to file surreply.	0.40 280.00/hr
	JSA	Research reasonableness of a lienor's search for competing liens under suspicious circumstances and identify Augello case (1.4); assist in drafting response to MTD based on results of research (1.1).	2.50 330.00/hr
	KH	Research and draft Surreply Brief and Motion for authority to file Surreply.	5.90 345.00/hr
	KH	Draft Corrected Motion for Surreply.	1.90 345.00/hr
6/11/2021	BB	Draft order denying defendants motion to dismiss.	0.40 280.00/hr
	JG	Strategize re order following hearing on motion to dismiss	0.20 395.00/hr
	BB	Attend hearing on Motion to Dismiss.	3.60 280.00/hr
	BB	Various phone calls with K. Hillary regarding hearing and subsequent order.	0.10 280.00/hr
	JSA	Research law re priority of unperfected security interest in goods verses buyer of such goods with knowledge of said interest (1.1); provide KH with resulting argument and supporting citations (.2).	1.30 330.00/hr
	KH	Prepare for and attend hearing on Zeidman's motion to dismiss.	5.90 345.00/hr
6/15/2021	JG	Strategize re amending complaint, results of motion to dismiss, next steps, call with Mark re same	0.90 395.00/hr
	BB	Meeting with K. Hillary and J. Grekin regarding litigation strategy.	0.40 280.00/hr
	KH	Strategize with Joe Grekin and Brandi Dobbs re: amended complaint and other issues.	0.80 345.00/hr

			<u>Hrs/Rate</u>	<u>Amount</u>
6/15/2021	KH	Call with Mark Shapiro re: amendment to complaint and other issues.	0.40 345.00/hr	
	KH	Draft stipulation and order granting authority to file an amended complaint and giving 14 days to answer.	0.40 345.00/hr	
	JG	Strategize re order re amending complaint	0.20 395.00/hr	NO CHARGE
6/16/2021	BB	Research regarding sufficiency of financing statement filed in another state.	3.20 280.00/hr	
	KH	Finalize and attend to filing stipulation to amend complaint with answer deadline	0.20 345.00/hr	NO CHARGE
6/17/2021	BB	Research regarding case law related to duty to investigate lien status.	1.50 280.00/hr	
6/18/2021	BB	Review and analyze dismissal hearing transcript with particular attention to issues and questions raised by the Judge.	3.00 280.00/hr	
6/21/2021	JG	Call with potential expert	0.20 450.00/hr	NO CHARGE
	BB	Draft memorandum regarding hearing transcript and development of issues raised.	3.80 280.00/hr	
	MB	Discussion with Joe re: strategizing re: possible expert testimony	0.30 485.00/hr	
	MB	Conference call with potential expert witness relative to value of diamond and analysis of sale of same	0.20 485.00/hr	
6/24/2021	JG	Preparation for strategy meeting, review Brandi's memorandum re same	0.90 395.00/hr	
	KH	Prepare for status meeting with Dan Weiner re: DuMouchelle case and Zeidman's lawsuit.	1.10 385.00/hr	
	BB	Meeting w/DJW, JG, KH, and BD re: case update and strategy moving forward	1.10 280.00/hr	NO CHARGE
	JG	Meeting w/DJW, JG, KH, and BD re: case update and strategy moving forward	1.10 395.00/hr	NO CHARGE

		<u>Hrs/Rate</u>	<u>Amount</u>
6/24/2021	KH Meeting w/DJW, JG, KH, and BD re: case update and strategy moving forward	1.10 345.00/hr	NO CHARGE
	DJW Meeting w/DJW, JG, KH, and BD re: case update and strategy moving forward	1.10 485.00/hr	
6/25/2021	BB Review and analyze document productions 1-3.	3.50 280.00/hr	
6/28/2021	BB Review and analyze additional documents and memoranda establishing the value of relevant jewelry.	2.00 280.00/hr	
	BB Draft chart regarding various statements of value for relevant pieces of jewelry.	1.50 280.00/hr	
	BB Research regarding methods of valuation of jewelry in fraudulent transfer actions.	1.00 280.00/hr	
6/29/2021	KH Review Transcript of hearing re: Motion to Dismiss.	1.50 345.00/hr	
	KH Continue drafting Amended Complaint.	1.30 345.00/hr	
	BB Review and revise chart of jewelry value.	2.00 280.00/hr	
	KH Email to Anthony Kochis re: possession of Noble Jewelry.	0.20 345.00/hr	
	JG Review portions of hearing transcript, review and revise wherefore clause for amended complaint	0.30 395.00/hr	
6/30/2021	KH Draft and file Amended Complaint.	2.60 345.00/hr	
7/1/2021	KH Call with William Noble and Barron Cass re: status of lawsuit and valuation issues.	0.40 345.00/hr	
7/13/2021	KH Receive and review answer to complaint and jury demand, begin drafting objection to jury demand.	0.70 345.00/hr	
7/14/2021	JG Strategize re jury demand, related issues	0.30 395.00/hr	NO CHARGE

		<u>Hrs/Rate</u>	<u>Amount</u>
7/14/2021	KH	Begin research re: jury trial issues.	0.80 345.00/hr
	KH	Begin drafting Spoilation/litigation hold letter	1.60 345.00/hr
7/23/2021	JG	Review and revise preservation letter	0.20 395.00/hr
	KH	Finalize and send preservation letter to Anthony Kochis.	0.70 345.00/hr
8/2/2021	JG	Strategize re 26f	0.10 395.00/hr
8/3/2021	KH	Prepare for and meet with Anthony and Joe re: 26f report.	1.50 345.00/hr
	JG	Prepare for and participate in 26f conference	1.40 395.00/hr
8/5/2021	KH	Review Model ESI rules and prepare for call with opposing counsel re: same.	0.90 345.00/hr
	KH	Draft 26f report and send same to Kochis with correspondence.	0.90 345.00/hr
8/6/2021	BB	Phone call with K. Hillary regarding jury trials in the bankruptcy court.	0.10 280.00/hr
	KH	Call with Anthony Kochis re: ESI and model rules.	1.20 345.00/hr
8/9/2021	KH	Receive, review and strategize re: email from Kochis re: stay of litigation.	0.50 345.00/hr
8/10/2021	JG	Review defendant's inserts to 26f report and suggest changes to our portions of the report	0.20 395.00/hr
	BB	REview and analyze Rule 26 report.	0.50 280.00/hr
	JG	Review and suggest revisions to 26f, strategize re same	0.40 395.00/hr

8/10/2021	JG	Strategize re jury issue and timing of raising	0.20 395.00/hr	NO CHARGE
	JG	Review proposed changes to 26f report from opposing counsel and suggest additional changes	0.20 395.00/hr	
	JG	Review research re jury demand issue	0.10 395.00/hr	
	BB	Research regarding the right to a jury trial in bankruptcy court.	3.20 280.00/hr	
	BB	Phone call with A. Kochis regarding Rule 26(f) report.	0.10 280.00/hr	
	KH	Revise 26f report.	1.30 345.00/hr	
	KH	Call with Joe and Brandi re: 26f report.	0.20 345.00/hr	
8/12/2021	JG	Initial preparation for 26f scheduling conference	0.30 395.00/hr	
	KH	Call with Joe and email to Brandi Dobbs re: research needed for initial status conference.	0.40 345.00/hr	
	KH	Email to client re: Zeidman's efforts to stay case and discovery issues.	0.20 345.00/hr	
8/13/2021	BB	Draft email memorandum regarding the right to a jury trial in bankruptcy court,	3.00 280.00/hr	
8/14/2021	JG	Review memorandum re jury rights, brief research re same	0.40 395.00/hr	
8/16/2021	JG	Preparation for scheduling conference, review 26f report, complaint, answer, brief research re equitable causes of action and defenses and jury demand	1.50 395.00/hr	
	JG	Participation in scheduling conference	1.60 395.00/hr	
	KH	Call with Joe Grekin to prepare for 26f conference.	0.40 345.00/hr	

		<u>Hrs/Rate</u>	
8/16/2021	KH	Draft revised 26f report and send same to Grekin with comment.	1.10 345.00/hr
	KH	Draft correspondence to Noble	0.80 345.00/hr
8/17/2021	JG	Review and revise preservation correspondence to Noble	0.30 395.00/hr
	JG	Review and revise 26f per court's instructions	0.20 395.00/hr
	JG	Strategize re various issues	0.10 395.00/hr
	BB	Review and analyze chart regarding jewelry value.	0.10 280.00/hr
	KH	Finalize 26f report and send to Kochis with correspondence.	0.20 345.00/hr
	JG	Prepare for and participate in litigation team meeting with Kim and Brandi.	0.70 395.00/hr
	BB	Conference with K. Hillary and J. Grekin regarding case status, strategy, and next steps.	0.50 280.00/hr
	JG	Draft correspondence to Mark re scheduling conference, next steps	0.10 395.00/hr
	JG	Strategize with Dan Weiner re status update	0.10 395.00/hr
	KH	Conference with B. Dobbs and J. Grekin regarding case status, strategy, and next steps.	0.50 345.00/hr
8/19/2021	JG	Review correspondence from opposing counsel and proposed changes to 26f	0.10 395.00/hr
	JG	Strategize re scheduling issues	0.30 395.00/hr
	JG	Review correspondences from Bill Noble, exchange correspondence with Bill re location of jewelry	0.20 395.00/hr

			<u>Hrs/Rate</u>	<u>Amount</u>
8/19/2021	JG	Call with Mark re expert issues, government document/Joe D testifying issues, draft brief memorandum re same	0.60 395.00/hr	
	KH	Finalize and send letter to Noble	0.40 345.00/hr	
	KH	Strategize re: 26f report and number of depositions.	0.20 345.00/hr	
	KH	Email to Ryan H and Bill N re: request for call, information needed and location of jewelry.	0.30 345.00/hr	
	KH	Draft email to Anthony Kochis re: dispute over number of depositions.	0.20 345.00/hr	
8/20/2021	JG	Exchange correspondence with Kochis re number of depositions	0.20 395.00/hr	
	JG	Exchange correspondence with Kochis re depositions	0.10 395.00/hr	
8/23/2021	BB	Conference with D. Weiner and J. Grekin regarding case status and next steps.	1.00 280.00/hr	NO CHARGE
	JG	Strategy meeting with Dan and Brandi re status update, forthcoming issues	1.00 395.00/hr	NO CHARGE
	JG	Exchange correspondence re 26f report with opposing counsel	0.10 395.00/hr	
	JG	Calls with opposing counsel, judge's clerk re revised 26f	0.50 395.00/hr	
	DJW	Attend litigation strategy meeting re: Ziedmans	1.00 485.00/hr	
8/24/2021	JG	Exchange correspondence with opposing counsel re call with court	0.10 395.00/hr	
	JG	Initial review of discovery requests	0.20 395.00/hr	
	JG	Strategize with Kim re various issues	0.30 395.00/hr	NO CHARGE

8/24/2021	BB	Conference with K. Hillary, J. Grekin, W. Noble, R. Heilman, and M. Baum regarding case status and next steps.	1.00 280.00/hr	NO CHARGE
	JG	Review documents in preparation for call with Noble	0.20 395.00/hr	
	JG	Call with Noble, follow up re various issues	1.00 395.00/hr	NO CHARGE
	BB	Review various documents to determine initial owner of jewelry and revise value chart to reflect the same.	0.50 280.00/hr	
	KH	Begin drafting Initial Disclosures.	1.10 345.00/hr	
	KH	Call with Bill Noble, Ryan Heilman, Michael Baum (from Noble's team), Joe Grekin and Brandi Dobbs re: expectations for discovery and litigation.	0.70 345.00/hr	NO CHARGE
	KH	Meet with Joe and Brandi re: strategy and steps moving forward.	0.40 345.00/hr	
	KH	Draft outline of items needing to be accomplished, assignment to attorneys and deadline for completion.	0.60 345.00/hr	
	KH	Prepare for Noble call, begin compiling information supporting claims.	0.90 345.00/hr	
	JG	Strategize re potential expert	0.10 395.00/hr	NO CHARGE
	JG	Review and revise chart of tasks and obligation dates	0.20 395.00/hr	
	JG	Strategize re overall case strategy	0.30 395.00/hr	NO CHARGE
	BB	Draft common interest agreement.	2.00 280.00/hr	
	DJW	Continue to strategize litigation approach	0.50 485.00/hr	
	DJW	Litigation strategy meeting	0.30 485.00/hr	

8/25/2021	JG	Review correspondence from Ryan Heilman and Wolfe complaint	0.20 395.00/hr
	JG	Review and revise initial disclosures	0.30 395.00/hr
	JG	Call with Mark re discovery requests from defendants	0.10 395.00/hr
	JG	Review documents from Baron Cass	0.10 395.00/hr
	JG	Review and revise joint offense agreement	0.30 395.00/hr
8/26/2021	JG	Preparation for call with Court re 26f	0.10 395.00/hr
	JG	Call with Court re 26g report and scheduling matters, follow up correspondence to opposing counsel re same	0.40 395.00/hr
	JG	Draft correspondence to Mark re discovery requests	0.10 395.00/hr
	JG	Review discovery from defendants	0.50 395.00/hr
	BB	Review and revise value chart to include insurance evaluation.	0.40 280.00/hr
	KH	Call with Joe Grekin re: responses to discovery, pattern.	0.20 345.00/hr
	JG	Call with Ryan Heilman re information re consignment jewelry/discovery requests	0.20 395.00/hr
	BB	Compare replacement value of jewelry to complaint and draft note regarding the same.	0.20 280.00/hr
8/27/2021	JG	Review chart re values	0.10 395.00/hr
	JG	Revise initial disclosures and strategize re same, call with Ryan Heilman re value of Baron Cass necklace, draft follow-up correspondence	0.50 395.00/hr

		<u>Hrs/Rate</u>	
8/27/2021	JG Begin responses to discovery requests	0.20 395.00/hr	
8/30/2021	JG Review initial disclosures draft	0.20 395.00/hr	NO CHARGE
	JG Exchange correspondence with Mark re initial disclosures, discovery requests, review comments on initial disclosures	0.20 395.00/hr	
	JG Review file re Yellow Rose diamond	0.20 395.00/hr	NO CHARGE
	JG Review briefs re yellow rose diamond, criminal complaint, discovery requests re yellow rose diamond	0.60 395.00/hr	NO CHARGE
	JG Exchange correspondence with Mark re responding to discovery requests	0.10 395.00/hr	
	JG Draft responses to discovery requests	1.10 395.00/hr	
	JG Review defendants' initial disclosures, draft correspondence to opposing counsel re insurance policy	0.20 395.00/hr	
	BB Review court rule regarding possession pending judgment.	0.40 280.00/hr	
	KH Make final revisions to initial disclosures and file same.	0.40 345.00/hr	
8/31/2021	JG Strategize re responses to discovery requests	0.10 395.00/hr	NO CHARGE
	JG Review insurance policy produced by Zeidman's	0.20 395.00/hr	
	BB Research regarding possession pending final judgment.	3.30 280.00/hr	
9/1/2021	JG Review scheduling order	0.10 395.00/hr	

			<u>Hrs/Rate</u>	
9/1/2021	BB	Research regarding federal court authority to grant motions for possession pending final judgment.	0.80 280.00/hr	
	JG	Review research re possession pending final judgment, conversion	0.10 450.00/hr	
	JG	Continue working on responses to discovery	0.40 395.00/hr	
	KH	Strategize with Joe Grekin re: responses to discovery requests.	0.30 345.00/hr	NO CHARGE
	BB	Review and analyze common interest agreement.	0.20 280.00/hr	
	KH	Call with JKG and Mark Shapiro re: discussions with federal government and production of documents	0.20 345.00/hr	NO CHARGE
	JG	Call with KH and Mark Shapiro re: discussions with federal government and production of documents	0.20 395.00/hr	
9/2/2021	BB	Draft correspondence to A. Kochis regarding the Noble Jewelry and escrow.	2.00 280.00/hr	
	JG	Strategize re motion for possession pending judgment	0.20 395.00/hr	NO CHARGE
	KH	Email with Karen Reynolds re: request for information.	0.20 345.00/hr	
9/3/2021	JG	Strategize re common interest agreement	0.10 395.00/hr	NO CHARGE
	JG	Review and revise escrow letter	0.10 395.00/hr	NO CHARGE
9/6/2021	JG	Revise letter requesting escrow	0.20 395.00/hr	
	JG	Draft correspondence to Mark re common interest agreement	0.10 395.00/hr	
9/8/2021	JG	Review forfeiture pleadings, review correspondence from Mark re same, common interest agreement, review common interest agreement re Mark's questions and draft response to Mark	0.60 395.00/hr	

		<u>Hrs/Rate</u>	
9/8/2021	JG	Review pleading in Dery v Noble	0.10 395.00/hr
	JG	Revise letter requesting jewelry in escrow	0.10 395.00/hr NO CHARGE
9/9/2021	JG	Exchange correspondence with Mark re joint interest agreement and inquiry to DOJ re forfeiture, draft correspondence to counsel for Noble re former	0.10 395.00/hr
	BB	Research regarding proper valuation method for jewelry.	2.80 280.00/hr
9/10/2021	BB	Additional research regarding valuation of jewelry.	1.00 280.00/hr
	BB	Review and analyze various documents regarding adversary proceeding 21-04041, Dery v. Noble.	1.00 280.00/hr
9/12/2021	JG	Review correspondence from Mark and DOJ re judgment of forfeiture, draft response to Mark	0.10 395.00/hr
9/13/2021	JG	Strategize re responses to discovery	0.10 395.00/hr NO CHARGE
	JG	Review memo re determination of value	0.20 395.00/hr
9/14/2021	BB	Research and draft memorandum regarding the right to a jury.	3.00 280.00/hr
	JG	Exchange correspondence with Mark re contact DOJ by Foley	0.10 395.00/hr
9/15/2021	JG	Review memo re jury rights	0.20 395.00/hr
	JG	Draft correspondence to opposing counsel re escrowing jewelry	0.10 395.00/hr
	JG	Exchange correspondence with opposing counsel re escrow, review correspondence from Mark re inquiry from Foley to DOJ	0.10 395.00/hr

			<u>Hrs/Rate</u>	<u>Amount</u>
9/15/2021	JG	Strategize re Foley issue	0.10 395.00/hr	NO CHARGE
	JG	Strategize re responses to discovery	0.10 395.00/hr	NO CHARGE
	KH	Begin drafting response to Interrogatories.	1.50 345.00/hr	
9/17/2021	JG	Assist in drafting discovery responses	0.20 395.00/hr	
	JG	Review correspondence from opposing counsel re escrow request and follow-up re denial	0.10 395.00/hr	
9/20/2021	KH	Continue drafting responses to Discovery	3.90 345.00/hr	
	JG	Call with counsel for Noble re responses to discovery	0.10 395.00/hr	NO CHARGE
	JG	Strategize re responses to discovery requests	0.20 395.00/hr	NO CHARGE
	JG	Assist in drafting responses to discovery requests	0.50 395.00/hr	
9/21/2021	JG	Assist in drafting discovery responses	0.60 395.00/hr	NO CHARGE
	KH	Finalize responses to Interrogatories and send to client for review and execution.	0.60 345.00/hr	
	JG	Review memorandum re complaint against Noble	0.10 395.00/hr	
	KH	Continue drafting responses to Zeidman's Request to Produce	6.90 345.00/hr	
9/22/2021	JG	Strategize re discovery responses	0.10 395.00/hr	NO CHARGE
	BB	Review and revise requests to admit and interrogatories.	1.70 280.00/hr	

			<u>Hrs/Rate</u>	<u>Amount</u>
9/22/2021	KH	Finalize and serve responses to discovery.	1.70 345.00/hr	
	KH	Continue drafting Discovery to Zeidmans.	2.10 345.00/hr	
	JG	Review various correspondence, draft correspondence re possible delay in sentencing	0.10 395.00/hr	NO CHARGE
9/23/2021	JG	Review and revise discovery requests, draft additional requests	1.60 395.00/hr	
	KH	Finalize discovery requests to Zeidman's	3.90 345.00/hr	
9/24/2021	JG	Review and revise discovery requests	0.70 395.00/hr	
	KH	Finalize discovery requests to Zeidmans and send same to client for review.	0.80 345.00/hr	
	JG	Call with Mark re status of criminal matter and effect on discovery	0.30 395.00/hr	
	KH	Call with client and Joe re: status of DuMouchelle sentencing and retrieval of documents from feds.	0.30 345.00/hr	NO CHARGE
9/26/2021	JG	Exchange correspondence with opposing counsel re meet and confer	0.10 395.00/hr	
9/27/2021	JG	Review correspondence from opposing counsel re meet and confer re discovery responses	0.10 395.00/hr	
9/28/2021	BB	Draft brief in support of motion for possession pending final judgment.	3.70 280.00/hr	
9/29/2021	JG	Strategize re Noble discovery	0.10 395.00/hr	NO CHARGE
	KH	Call with Ryan Heilman re: Noble's response to prior email re: interrogatories.	0.20 345.00/hr	
10/1/2021	JG	Call with opposing counsel re responses to discovery requests	0.80 395.00/hr	

			Page	21
			<u>Hrs/Rate</u>	<u>Amount</u>
10/1/2021	KH	Telephone conversation with Anthony Kochis and JKG re: discovery responses	0.80 345.00/hr	NO CHARGE
10/12/2021	JG	Assist in responding to discovery requests	0.20 395.00/hr	
	BB	Research regarding discovery obligations of a plaintiff-assignee and trustee.	1.50 280.00/hr	
	BB	Conference with K. Hillary and J. Grekin re discovery responses.	0.10 280.00/hr	
	BB	Determine proper format for production of documents.	0.30 280.00/hr	
10/13/2021	JG	Review memorandum re responsibility to produce Zeidman's documents	0.20 395.00/hr	
	JG	Assist in review of documents re response to document requests, call with Heilman re same	1.20 395.00/hr	
	BB	Review documents regarding requests to produce for responsiveness and privilege.	4.90 280.00/hr	
	KH	Document review and production analysis.	7.10 345.00/hr	
10/14/2021	JG	Assist in responding to discovery requests	1.20 395.00/hr	
	BB	Review and analyze various documents for responsiveness to requests to produce.	3.40 280.00/hr	
	JG	Draft correspondence to opposing counsel re doc production	0.10 395.00/hr	
	JG	Strategize re preparation of response to demand re discovery requests from opposing counsel	0.20 395.00/hr	NO CHARGE
10/15/2021	JG	Exchange correspondence with opposing counsel re document production	0.10 395.00/hr	
	BB	Review and analyze additional documents regarding responsiveness to discovery requests.	1.50 280.00/hr	

			Page	22
			<u>Hrs/Rate</u>	<u>Amount</u>
10/15/2021	BB	Finalize document production.	2.00 280.00/hr	
10/19/2021	BB	Additional research regarding the scope of discovery obligations applicable to a trustee in bankruptcy and to an assignee of a claim.	2.00 280.00/hr	
	BB	Draft email to A. Kochis regarding objections to requests to produce.	0.50 280.00/hr	
	JG	Review and revise response to Kochis demand re production of documents of others	0.50 395.00/hr	
	JG	Exchange correspondence with opposing counsel	0.10 395.00/hr	
	JG	Strategize re various issues including motion for possession pending judgment	0.10 395.00/hr	
	BB	Review and revise email to A. Kochis re document production.	0.10 280.00/hr	
10/21/2021	JG	Exchange correspondence with Mark re latest from DOJ	0.10 395.00/hr	
	JG	Review and revise motion for possession pending judgment	0.50 395.00/hr	NO CHARGE
10/27/2021	JG	Strategize re motion for possession pending judgment	0.20 395.00/hr	
	BB	Conference with J. Grekin re Motion for Possession.	0.20 280.00/hr	
	JG	Review motion to compel, analyze same issue by issue, plan response, meeting with Mark re same	1.70 395.00/hr	
	BB	Conference with K. Hillary re Motion to Compel.	0.40 280.00/hr	NO CHARGE
	BB	Review and analyze Motion to Compel.	0.60 280.00/hr	
	KH	Discuss Yellow Rose Diamond and related discovery issues with Brandi.	0.40 345.00/hr	

		<u>Hrs/Rate</u>	<u>Amount</u>
10/27/2021	JG Call with Tracy Clark re response to motion to compel	0.10 395.00/hr	
10/29/2021	JG Begin drafting response to motion to compel	0.20 395.00/hr	
	KH Begin drafting privilege log, and continued review of documents.	1.50 345.00/hr	
10/30/2021	JG Draft response to motion to compel, research re same	1.50 395.00/hr	
10/31/2021	JG Draft response to motion to compel	2.60 395.00/hr	
11/1/2021	JG Draft response to motion to compel	2.30 395.00/hr	
11/2/2021	JG Draft response to motion to compel	3.40 395.00/hr	
	BB Review and analyze motion to compel discovery and compare to documents produced to defendant.	2.30 280.00/hr	
	KH Receive, review and respond to email from Brandi Dobbs re: response to Motion to Compel.	0.30 345.00/hr	
	BB Email to J. Grekin and K. Hillary regarding analysis of discovery issues presented in motion to compel.	0.20 280.00/hr	
	BB Review and analyze attachments to produced emails.	0.30 280.00/hr	
11/3/2021	JG Review document re possible production as supplement in response to motion to compel	0.20 395.00/hr	
	BB Review and analyze various memoranda pertaining to pieces of Noble jewelry as compared to documents produced.	1.00 280.00/hr	
11/4/2021	JG Call with Ryan Heilman re status of various issues, payments to Noble from Dumouchelle	0.30 395.00/hr	
	BB Draft portion of response to Motion to Compel regarding miscellaneous alleged deficiencies.	0.80 280.00/hr	

		<u>Hrs/Rate</u>	<u>Amount</u>
11/4/2021	JG Review and revise response to motion to compel	2.60 395.00/hr	
11/5/2021	JG Review and respond to motion to compel	0.30 395.00/hr	
	BB Review and revise response to motion to compel.	0.60 280.00/hr	
	JG Revise response to motion to compel	0.20 395.00/hr	
	JG Assist in preparing exhibits for filing re response to motion to compel	0.30 395.00/hr	
	BB Review and revise response to motion for protective order.	3.00 280.00/hr	
	KH Draft revisions to Response to Motion to Compel.	3.10 345.00/hr	
11/9/2021	KH Finalize privilege log, and production of documents.	3.90 345.00/hr	
	JG Assist in drafting privilege log	0.20 395.00/hr	
	JG Assist in drafting privilege log	0.30 395.00/hr	
	JG Exchange correspondence with opposing counsel re re-scheduling motion to compel, call to chambers re same	0.20 395.00/hr	
	JG Call with Ryan Heilman re joint defense agreement	0.10 395.00/hr	
11/10/2021	JG Draft proposed stipulated order adjourning hearing on motion to compel, correspondence with opposing counsel re same	0.30 395.00/hr	
11/11/2021	BB Review and revise motion for possession pending final judgment.	2.00 280.00/hr	
11/12/2021	JG Review order re adjourning hearing on motion to compel	0.10 395.00/hr	

			Page	25
			<u>Hrs/Rate</u>	<u>Amount</u>
11/12/2021	JG	Strategize re motion to object to jury	0.10 395.00/hr	
	BB	Conference with K. Hillary and J. Grekin re jury right.	0.10 280.00/hr	NO CHARGE
	BB	Review and analyze jury trial research.	0.30 280.00/hr	
	JG	Review memorandum re jury trial issues	0.20 395.00/hr	
	JG	Call with Mark re jury demand, update on DOJ and sentencing	0.20 395.00/hr	
11/23/2021	BB	Review and analyze discovery responses.	2.50 280.00/hr	
11/30/2021	KH	Review discovery responses and begin drafting correspondence re: shortcomings.	3.30 345.00/hr	
12/1/2021	BB	Draft memorandum email to K. Hillary and J. Grekin regarding issues related to Defendant's discovery responses.	0.80 280.00/hr	
12/2/2021	JG	Review memorandum re discovery responses	0.20 395.00/hr	
	JG	Review responses to discovery, strategize re same	0.70 395.00/hr	
	JG	Review and revise motion for possession pending judgment, strategize re motion for spoliation	0.80 395.00/hr	
	KH	Meet with Brandi re: responses to discovery.	0.50 345.00/hr	
	KH	Call with Ryan Heilman re: Zeidman's discovery responses.	0.20 345.00/hr	
	BB	Conference with K. Hillary to discuss various discovery issues and next steps.	0.50 280.00/hr	NO CHARGE
12/3/2021	BB	Review and analyze documents produced by defendants with particular attention to documents related to value and sale of Noble jewelry.	2.00 280.00/hr	

		<u>Hrs/Rate</u>	
12/6/2021	JG	Call with potential expert	0.40 395.00/hr
	JG	Strategize re expert witness	0.10 395.00/hr
	JG	Call with Mark re payment for expert witness, follow up re same	0.20 395.00/hr
	JG	Call with Ryan Heilman re expert witness issue	0.10 395.00/hr
	JG	Call with Ryan re opinion on motion to dismiss	0.10 395.00/hr
	BB	Draft letter to A. Kochis regarding various discovery issues.	1.60 280.00/hr
12/7/2021	JG	Review and revise meet and confer letter	0.40 395.00/hr
	JG	Review and revise motion for possession pending final judgment	0.70 395.00/hr
	JG	Call with potential expert re hiring, fees	0.30 395.00/hr
	BB	Review and revise letter to A. Kochis re discovery issues.	0.10 280.00/hr
	KH	Brief review of motion.	0.30 345.00/hr
	JG	Strategize re motion to compel	0.20 395.00/hr
12/8/2021	JG	Review reply brief re motion to compel, draft brief notes re same	0.50 395.00/hr
	JG	Strategize re hearing on motion to compel	0.10 395.00/hr
12/9/2021	KH	Finalize meet and confer letter to Kochis	0.50 345.00/hr

NO CHARGE

NO CHARGE

			<u>Hrs/Rate</u>	
12/9/2021	BB	Research regarding discovery of a third party in an adversary proceeding.	1.20 280.00/hr	
	BB	Attention to various discovery issues outlined in defendant's motion to compel.	0.80 280.00/hr	
	KH	Assist Joe Grekin to prepare for hearing on Zeidman's Motion to Compel.	1.20 345.00/hr	
	JG	Preparation for hearing on motion to compel	0.20 395.00/hr	
12/10/2021	BB	Review case law regarding turnover in adversary proceedings.	0.30 280.00/hr	
	JG	Prepare for and participate in hearing on motion to compel	6.80 395.00/hr	
	BB	Research regarding spoliation of evidence.	3.20 280.00/hr	
12/11/2021	JG	Exchange correspondence with opposing counsel re meet and confer	0.10 395.00/hr	
	JG	Review various correspondence	0.10 395.00/hr	NO CHARGE
12/13/2021	JG	Follow up re hearing on motion to compel, organize files re same	0.10 395.00/hr	
	BB	Conference with J. Grekin re spoliation motion.	0.20 280.00/hr	NO CHARGE
	JG	Strategize re discovery issues, spoliation	0.20 395.00/hr	NO CHARGE
	JG	Call with potential expert witness	0.20 395.00/hr	
	BB	Draft spoliation motion.	3.50 280.00/hr	
12/14/2021	BB	Revise discovery responses to conform with discovery production.	2.00 280.00/hr	

		<u>Hrs/Rate</u>	<u>Amount</u>
12/14/2021	JG	Call with Mark re status update, expert, motion to compel	0.30 395.00/hr
	JG	Attention to production issues to opposing counsel - follow up re hearing on motion to compel	0.10 395.00/hr
	BB	Coordinate sending discovery items to A. Kochis.	0.60 280.00/hr
12/15/2021	JG	Review and revise draft of spoliation motion	0.80 395.00/hr
	JG	Review defendants' responses to discovery requests and prepare for meet and confer	1.20 395.00/hr
	JG	Call with opposing counsel re meet and confer	0.30 395.00/hr
	BB	Review and revise spoliation motion.	3.00 280.00/hr
	DJW	Strategize case theories and approaches	1.10 590.00/hr
12/16/2021	JG	Review and revise spoliation motion, strategize re same	2.30 395.00/hr
	BB	Review and revise spoliation motion.	2.30 280.00/hr
	DJW	Strategize motion for presumption/spoliation of evidence	1.00 590.00/hr
12/17/2021	JG	Review and revise spoliation motion	1.00 395.00/hr
12/19/2021	JG	Call with expert re terms of retention	0.10 395.00/hr
12/20/2021	JG	Review and revise spoliation motion	0.40 395.00/hr
	JG	Draft Kuperwasser retainer agreement, draft correspondence to Mark re same	1.20 395.00/hr

12/21/2021	JG	Draft correspondence to Anthony re meet and confer follow up, concurrence requests on motion for spoliation and motion for possession	0.20 395.00/hr	
	JG	Exchange correspondence with Anthony re response to issues re discovery responses	0.10 395.00/hr	
	JG	Preparation of motions for filing	0.10 395.00/hr	
	BB	Draft Motion for possession pending final judgment.	0.30 280.00/hr	
	BB	Draft Motion re spoliation of evidence.	0.30 280.00/hr	
	JG	Review and revise spoliation brief re new facts	1.60 395.00/hr	
	JG	Exchange correspondence with Anthony re responses to discovery requests	0.10 395.00/hr	
	BB	Research regarding adverse inferences related to spoliation.	1.00 280.00/hr	
	KH	Draft revisions to Spoliation Motion.	2.30 345.00/hr	
	BB	Research regarding spoliation of evidence via sale thereof.	0.60 280.00/hr	
12/22/2021	JG	Review correspondence and release related to spoliation motion, review research re same, revise spoliation motion re same	0.80 395.00/hr	
	BB	Prepare draft orders re spoliation and possession pending final judgment.	0.40 280.00/hr	
	JG	Review and revise motion for possession pending judgment, order for same, order re motion for spoliation	3.00 395.00/hr	
	BB	Review and revise spoliation motion	0.50 280.00/hr	

			<u>Hrs/Rate</u>	
12/22/2021	KH	Continue review of exhibits and assist with factual development for Spoiliation Motion.	1.30 345.00/hr	
12/23/2021	JG	Exchange correspondence with Anthony re requested extension of time to respond to motions for spoliation and for possession pending final judgment	0.10 395.00/hr	
	JG	Review proposed order re extension of time to respond to motions and approve same	0.10 395.00/hr	
1/3/2022	JG	Exchange correspondence with Mark re engagement letter	0.10 410.00/hr	
	JG	Exchange correspondence with Mark re various issues, follow up re sale of jewelry	0.10 410.00/hr	
	JG	Review correspondence from Kochis re response to meet and confer, draft correspondence to Mark re same	0.20 410.00/hr	
	BB	Review and analyze letter from A. Kochis re discovery issues.	0.30 290.00/hr	
1/4/2022	JG	Review correspondences from opposing counsel re supplemental production	0.10 410.00/hr	
	JG	Review and revise letter per instructions from Mark, draft correspondence to Mark re same	0.30 410.00/hr	
	JG	Conference with Brandi and Kim re various issues, including retaining expert and reviewing supplemental discovery production	0.40 410.00/hr	
	BB	Conference with K. Hillary and J. Grekin re discovery status and next steps.	0.40 290.00/hr	NO CHARGE
	BB	Review and analyze discovery responses.	0.40 290.00/hr	NO CHARGE
	JG	Draft correspondence to Mark re sale of jewelry	0.10 410.00/hr	
	KH	Meet with Joe and Brandi re: next steps.	0.40 360.00/hr	NO CHARGE

		<u>Hrs/Rate</u>	<u>Amount</u>
1/5/2022	JG	Exchange correspondence with Mark re motion to employ expert, review correspondence re held jewelry	0.10 410.00/hr
	JG	Call with Mark re various issues, follow up on same, research and witness issues	0.70 410.00/hr
	BB	Begin drafting motion to employ.	1.30 290.00/hr
1/6/2022	JG	Draft correspondence to potential expert re proposed retainer agreement	0.20 410.00/hr
	BB	Finish drafting motion to employ and related exhibits.	1.60 290.00/hr
	JG	Exchange correspondence with Mark re valuing jewelry in estate and selling same	0.10 410.00/hr
	JG	Exchange correspondence with potential expert re retainer agreement	0.10 410.00/hr
1/7/2022	JG	Review correspondence from opposing counsel, motion to extend dates and expedite hearing, draft correspondence to Mark re same	0.20 410.00/hr
	BB	Conference with K. Hillary regarding potential witnesses and affidavits.	0.10 290.00/hr
1/10/2022	JG	Call with expert witness re retainer agreement	0.20 410.00/hr
	JG	Review order re motion to expedite hearing re motion to adjourn dates	0.10 410.00/hr
	JG	Draft correspondence to opposing counsel re proposed 90 day extension of dates`	0.10 410.00/hr
	JG	Strategize re response to motion to extend dates	0.20 410.00/hr
	JG	Revise retainer agreement per requests of potential expert, draft correspondence to Mark re same	0.20 410.00/hr
	BB	Review and analyze produced discovery to confirm completeness.	0.50 290.00/hr

NO CHARGE

1/10/2022	BB	Email to A. Kochis re discovery production.	0.10 290.00/hr	
	JG	Call with opposing counsel re motion to extend dates	0.20 410.00/hr	
1/11/2022	BB	Review and analyze additional documents for discovery production.	0.80 290.00/hr	
	JG	Exchange correspondence with opposing counsel re motion to extend dates	0.10 410.00/hr	
	JG	Assist in drafting response to motion to extend dates	0.20 410.00/hr	
	BB	Phone call with J. Larsen re stipulation.	0.10 290.00/hr	
	BB	Review and analyze stipulation to extend.	0.20 290.00/hr	
	BB	Review and analyze discovery requests and potential supplemental documents.	0.50 290.00/hr	
	BB	Phone call with JKG regarding response.	0.20 290.00/hr	NO CHARGE
1/12/2022	JG	Review correspondences from opposing counsel re supplementation to discovery, review documents at issue as attachments not produced	0.20 410.00/hr	
	JG	Draft correspondence to potential expert with re retainer letter revised	0.10 410.00/hr	
	JG	Exchange correspondence with expert re retainer agreement, draft correspondence to Mark re same	0.10 410.00/hr	
	BB	Draft response to motion to extend dates.	1.50 290.00/hr	
	JG	Review and revise motion to retain expert	0.30 410.00/hr	
	JG	Review and suggest revisions to response to motion to extend dates	0.20 410.00/hr	

		<u>Hrs/Rate</u>	
1/12/2022	JG	Call with opposing counsel re extending dates	0.10 410.00/hr
	KH	Draft revisions to Response to Motion to Compel extension of discovery dates.	2.20 360.00/hr
1/13/2022	JG	Strategize re reply briefs re motions for spoliation instruction and for possession pending final judgment	0.10 410.00/hr
	JG	Draft proposed order re motion to extend dates	0.30 410.00/hr
1/14/2022	JG	Strategize re analysis of discovery requests	0.20 410.00/hr
	KH	Attend to discovery, expert, case strategy and next steps.	0.30 360.00/hr
	JG	Strategize re response to motion for spoliation presumption and assist in drafting reply	0.30 410.00/hr
	JG	Call with Mark re various issues	0.20 410.00/hr
	JG	Review and revise proposed order re motion to extend dates, draft correspondence to opposing counsel re same	0.20 410.00/hr
	BB	Review and analyze responses to Motions for Spoliation and Possession.	1.10 290.00/hr
	JG	Exchange correspondence with Mark re motion for possession pending judgment	0.10 410.00/hr
	JG	Exchange correspondence with opposing counsel re proposed resolution to motion to extend, also supplementation of interrogatory 7	0.10 410.00/hr
	JG	Review correspondence from opposing counsel re supplemental production and follow up re same	0.10 410.00/hr
	BB	Draft supplemental interrogatory responses.	0.40 290.00/hr

		<u>Hrs/Rate</u>	<u>Amount</u>
1/14/2022	JG	Preparation for hearing re motion to extend dates, hearing on motion to compel, motion to extend dates	2.20 410.00/hr
	JG	Review and revise supplemental answer to interrogatory 7	0.10 410.00/hr
1/16/2022	JG	Review and revise motion to hire Kuperwasser, order, declaration, draft correspondence to Kuperwasser re same	0.70 410.00/hr
	JG	Review proposed order re motion to extend dates, draft correspondence to Anthony re same	0.10 410.00/hr
1/17/2022	JG	Review responses to motions for possession pending final judgment and spoliation, review exhibits, review complaint and original motions, strategize re replies	1.90 410.00/hr
	JG	Assist in drafting verification of interrogatory	0.20 410.00/hr
	BB	Review response to spoliation motion and next steps.	0.40 290.00/hr
	JG	Strategy conference re motion for spoliation, motion for possession pending judgment	0.90 410.00/hr
	BB	Conference with K. Hillary and J. Grekin re spoliation motion and next steps.	1.00 290.00/hr
	KH	Call with Joe and Brandi re: information needed for response in support of Spoliation motion.	0.90 360.00/hr
	KH	Receive and review response to spoliation motion.	0.90 360.00/hr
	KH	Call with John Leone re: negotiations with Zeidman's re: ECG green diamond.	0.50 360.00/hr
	JG	Review and revise supplemental response to interrogatory #7	0.20 410.00/hr
	JG	Call with Charles Kuperwasser re application to retain expert	0.20 410.00/hr

		<u>Hrs/Rate</u>	
1/17/2022	JG	Exchange correspondence with Kuperwasser re application to employ, draft correspondence to Mark re supplemental response	0.10 410.00/hr
	KH	Follow up call with Joe Leone re: Zeidman's demand for trustee release.	0.40 360.00/hr
	KH	Email to client re: Zeidman's demand that trustee release claims.	0.20 360.00/hr
	KH	Review various email correspondence relating to Zeidman's knowledge of Trustee's claims to pawned jewelry.	0.70 360.00/hr
	JG	Review correspondence from Mark, draft return, re knowledge of Zeidman's	0.10 410.00/hr
1/18/2022	JG	Draft correspondence to Ryan Heilman re motion for adverse inference	0.10 410.00/hr
	KH	Call with John Leone and receive and review follow up email in lieu of subpoena re: Ziedman's demand for Trustee release in connection with green diamond.	0.20 360.00/hr
	KH	Review proofs of Zeidman's demand for trustee release in connection with green diamond.	0.20 360.00/hr
	JG	Call with Ryan Heilman and Bill Noble re response to spoliation motion	0.60 410.00/hr
	JG	Strategize re possible support re knowledge of Zeidman's re trustee pursuing claims	0.80 410.00/hr
	KH	Review proofs related to spoliation.	0.90 360.00/hr
	BB	Conference with JKG regarding factual development of reply to spoliation motion.	0.10 290.00/hr
1/19/2022	JG	Correspondence to opposing counsel re supplemental response to interrogatory 7	0.10 410.00/hr
	JG	Review various correspondences re reply brief re motion re spoliation	0.10 410.00/hr

NO CHARGE

NO CHARGE

		<u>Hrs/Rate</u>	<u>Amount</u>
1/19/2022	JG	Exchange correspondence with opposing counsel re supplemental response to interrogatory 7	0.10 410.00/hr
	BB	Finalize motion to employ Kuperwasser.	0.20 280.00/hr
	JG	Exchange correspondence with opposing counsel re interrogatory supplement 7	0.10 410.00/hr
	BB	Research regarding service and notice requirements related to an application to employ.	0.40 280.00/hr
	BB	Attention to application to employ Kuperwasser.	1.00 280.00/hr
	JG	Draft reply brief re motion for possession pending final judgment	0.70 410.00/hr
	BB	Draft reply brief re spoliation motion.	2.80 290.00/hr
	NM	Attention to finalizing and filing application/exhibits and consent to employ expert witness, email filed documents to UST for review and approval	1.00 170.00/hr
1/20/2022	JG	Review order re motion to compel	0.10 410.00/hr
	JG	Draft reply brief re motion for possession	1.90 410.00/hr
	JG	Exchange correspondence with Ryan re reply brief	0.20 410.00/hr
	JG	Attention to supplemental discovery responses	0.20 410.00/hr
	BB	Draft reply to spoliation motion.	1.10 290.00/hr
1/21/2022	JG	Call with Ryan re Noble affidavit, follow up re same	0.50 410.00/hr
	JG	Call with Kuperwasser re affidavit to support reply brief	0.30 410.00/hr

		<u>Hrs/Rate</u>	<u>Amount</u>
1/21/2022	BB Phone call with C. Kuperwasser.	0.20 290.00/hr	NO CHARGE
	BB Draft affidavit of C. Kuperwasser.	0.50 290.00/hr	
	JG Draft correspondence to opposing counsel re supplement to interrogatory 7	0.10 410.00/hr	
	JG Strategize re reply brief and affidavits re spoliation motion	0.20 410.00/hr	NO CHARGE
	KH Assist with drafting Affidavits in support of jewelry value and spoliation.	0.70 360.00/hr	
	BB Continue drafting reply brief for motion re spoliation.	5.50 290.00/hr	
1/22/2022	JG Draft reply brief re motion for possession	2.40 410.00/hr	
	BB Review and revise draft reply brief re spoliation motion.	2.80 290.00/hr	
1/23/2022	JG Review and revise reply brief re spoliation motion, draft correspondence to Ryan re affidavit	1.30 410.00/hr	
	JG Review and revise reply brief re motion for possession	0.50 410.00/hr	
	BB Review and revise reply re spoliation motion with particular attention to necessary exhibits.	1.10 290.00/hr	
1/24/2022	JG Research re reply re motion for possession pending final judgment, attention to exhibits and other details re reply brief re spoliation motion	0.60 410.00/hr	
	JG Exchange correspondence with Mark re insolvency issue	0.10 410.00/hr	
	JG Strategize re Hillary affidavit, exhibits, reply briefs	0.40 410.00/hr	NO CHARGE
	JG Finalize reply brief, motion for possession	0.80 410.00/hr	

		<u>Hrs/Rate</u>	<u>Amount</u>
1/24/2022	JG	Review correspondence from Ryan and Anthony re current status of criminal proceedings	0.10 410.00/hr
	JG	Finalize reply brief re spoliation motion, strategize re affidavit	0.50 410.00/hr
	BB	Review and revise reply re spoliation motion.	1.20 290.00/hr
	KH	Draft Affidavit in support of Spoliation Motion.	1.60 360.00/hr
	NM	Review email received from UST re: expert witness employment and forward same to JKG for review	0.20 170.00/hr
	NM	Notarize spoliation brief for KKH	0.40 170.00/hr
			NO CHARGE
1/25/2022	JG	Review correspondence from UST and direct answer to same, review correspondence from Mark	0.10 410.00/hr
	JG	Review correspondence from opposing counsel re assignment agreement, consignment agreement, review assignment agreement	0.20 410.00/hr
	BB	Email to UST re application to employ.	0.10 290.00/hr
1/26/2022	JSA	Assist NM in researching Rule 6003 related issues.	0.30 345.00/hr
	BB	Phone call with Heidi from Foley re application to employ.	0.10 290.00/hr
	NM	Research re: USCS Bankruptcy Rule 6003 re: expert witness employment	0.90 170.00/hr
	NM	Finalize concurrence re: expert witness, file same and upload order to judge	0.40 170.00/hr
1/27/2022	JG	Review notice re hearing re application to hire expert, strategize re same	0.20 410.00/hr
	JG	Initial preparation for motion hearings - spoliation, possession	0.70 410.00/hr

		<u>Hrs/Rate</u>	<u>Amount</u>
1/27/2022	KH Strategize re: hearing scheduled on App to Employ Expert.	0.20 360.00/hr	NO CHARGE
1/28/2022	JG Review research re motion for spoliation	1.00 410.00/hr	
	JG Preparation for motion for spoliation	0.40 410.00/hr	NO CHARGE
	JG Review objection to application to employ	0.20 410.00/hr	
	JG Review allegations in complaint and responses in answer re pawning of jewelry	0.10 410.00/hr	
	JG Review correspondence from Zeidman's counsel re jewelry debtor pawned, matching with affidavit of Zeidman's and complaint	0.30 410.00/hr	
	JG Review affidavit supporting Zeidman's response to motion spoliation	0.40 410.00/hr	
	BB Research regarding standing of insolvent chapter 7 debtor to object to applications to employ.	2.00 290.00/hr	
	BB Review and analyze Debtor's objection to application to employ.	0.20 290.00/hr	
	BB Review and analyze Defendant's Answer, with particular attention to answers regarding pawn transactions.	0.40 290.00/hr	
	BB Review and analyze attachments to spoliation response.	0.20 290.00/hr	
	BB Revise motion to employ Kuperwasser.	0.50 290.00/hr	
	KH Receive and review Foley's objection to application to employ expert. Prepare for and attend hearing on Application to Employ Kupperwaser.	1.80 360.00/hr	
	KH Review evidentiary support for pawn transactions instead of sales.	0.40 360.00/hr	

		<u>Hrs/Rate</u>	<u>Amount</u>
1/28/2022	JG	Preparation for hearings on spoliation motion, motion for possession, also assist re application to employ	1.60 410.00/hr
	JG	Hearing re application to employ, motions for possession and adverse inference	3.60 410.00/hr
	JG	Strategize re outcomes of motions for possession and for adverse inference	0.30 410.00/hr
	JG	Call Mark re results of hearings, next steps	0.30 410.00/hr
1/30/2022	JG	Strategize re results of hearings	0.10 410.00/hr
	JG	Review notices related to hearings on motions for possession and spoliation, application to employ, draft correspondence to opposing counsel re scheduling issue	0.10 410.00/hr
	JG	Exchange correspondence with opposing counsel re various issues	0.10 410.00/hr
1/31/2022	JG	Attention to scheduling issues	0.10 410.00/hr
	JG	Attention to post-motion organization	0.10 410.00/hr
	JG	Draft order re application to retain Kuperwasser	0.10 410.00/hr
	JG	Draft notes re safekeeping protocol and discovery issues re spoliation	0.60 410.00/hr
	JG	Strategize re settlement approach	0.20 410.00/hr
	JG	Call with judge's clerk re mis-scheduling of scheduling conference	0.10 410.00/hr
	JG	Call with expert witness and follow up re order re application to employ	0.30 410.00/hr
	JG	Call with Ryan Heilman re various issues	0.40 410.00/hr

		<u>Hrs/Rate</u>	<u>Amount</u>
1/31/2022	DJW Internal settlement approach strategy	0.40 590.00/hr	
	KH Draft revised language to order granting Application to Employ expert.	0.40 360.00/hr	
2/1/2022	BB Review and analyze chart of closed pawn tickets as compared to the Noble Jewelry.	0.50 290.00/hr	
	BB Conference with J. Grekin and K. Hillary regarding discovery and next steps.	0.80 290.00/hr	NO CHARGE
	JG Meeting re spoliation contested matter and related issues	0.80 410.00/hr	
	BB Review and compile documents to be reviewed by C. Kuperwasser.	0.80 290.00/hr	
	KH Meet with Brandi and Joe re: discovery issues and action items.	0.80 360.00/hr	NO CHARGE
	BB Review and revise proposed order granting Kuperwasser application.	0.50 290.00/hr	
	BB Email to UST re Kuperwasser application.	0.10 290.00/hr	
2/2/2022	BB Email to UST regarding consent for employment order.	0.10 290.00/hr	
	JG Review correspondence from opposing counsel re safekeeping protocol and scheduling issues re 26 f, draft response	0.40 410.00/hr	
	JG Call with opposing counsel re 26f report re spoliation issues, related issues, safety protocol	0.80 410.00/hr	
	JG Revise 26f report per call with opposing counsel	0.20 410.00/hr	
	KH Begin researching Spoliation standard.	1.90 360.00/hr	
2/3/2022	JG Draft subpoena and attachments to Noble	0.20 410.00/hr	

		<u>Hrs/Rate</u>	<u>Amount</u>
2/3/2022	JG	Review filing re Kuperwasser, draft correspondence to opposing counsel re 26f report	0.10 410.00/hr
	JG	Review and revise subpoena to Noble	0.10 410.00/hr
	JG	Finalize subpoena, draft correspondence to Heilman re same	0.10 410.00/hr
	BB	Review and analyze documents turned over in discovery.	1.00 290.00/hr
2/4/2022	JG	Exchange correspondence with expert re documents to review, next steps	0.10 410.00/hr
	JG	Draft correspondence to Kuperwasser re order appointing, draft correspondence to Mark re executing agreement for Kuperwasser	0.10 410.00/hr
	JG	Draft discovery requests re spoliation	2.00 410.00/hr
2/5/2022	JG	Review correspondence from opposing counsel re various issues, draft return, review proposed changes to 26 f report re spoliation issues, propose revisions to opposing counsel	0.30 410.00/hr
2/6/2022	JG	Review supplemental discovery produced by opposing counsel	0.20 410.00/hr
2/7/2022	JG	Review correspondence from opposing counsel, review document requests, interrogatories, order compelling, draft response	0.60 410.00/hr
	JG	Exchange correspondence with opposing counsel re various issues	0.10 410.00/hr
	JG	Exchange correspondence with opposing counsel re 26f report, modify same re correspondence exchange and file same	0.20 410.00/hr
	KH	Strategize with Joe Grekin and Brandi Dobbs re: Eli M. release information.	0.20 360.00/hr
	JG	Strategize re approach to ECG	0.20 410.00/hr
			NO CHARGE

		<u>Hrs/Rate</u>	<u>Amount</u>
2/7/2022	JG	Call with Mark re various issues including mediation and jewelry protocol	0.20 410.00/hr
	JG	Draft correspondence to opposing counsel re jewelry protocol	0.10 410.00/hr
2/8/2022	JG	Preparation for call with opposing counsel re jewelry protocol and discovery to Noble, call and follow up re additional subpoena to Noble	0.50 410.00/hr
	JG	Call with Heilman re various issues	0.40 410.00/hr
	JG	Exchange correspondence with Mark re ECG and with Kuperwasser re document review	0.10 410.00/hr
2/9/2022	JG	Review correspondence from Mark re ECG, follow up re need to subpoena	0.10 410.00/hr
	JG	Draft subpoena to Noble	0.20 410.00/hr
2/11/2022	JG	Review proposed order re motion for possession, draft proposed change, draft correspondence to Mark re same	0.30 410.00/hr
	JG	Review and revise document requests and subpoena to Noble, call with Ryan re same	0.40 410.00/hr
	JG	Review correspondence from Mark re proposed order, draft correspondence to opposing counsel re same	0.10 410.00/hr
	JG	Draft correspondence to Ryan Heilman re second subpoena	0.10 410.00/hr
	JG	Review correspondence from Mark re selling jewelry left in estate, draft correspondence to Charles re same	0.10 410.00/hr
	JG	Review correspondence from Heilman and Noble responses to Zeidman's discovery requests	0.10 410.00/hr
	JG	Exchange correspondence with Mark and Charles re sale of small jewelry	0.20 410.00/hr

		<u>Hrs/Rate</u>	<u>Amount</u>
2/11/2022	JG	Exchange correspondence with opposing counsel re order re safety protocol, review changes made by opposing counsel	0.10 410.00/hr
	JG	Exchange correspondence with opposing counsel re wording of proposed order re safety protocol	0.10 410.00/hr
	KH	Brief review of proposed order resolving motion for possession pending final judgment.	0.20 360.00/hr
	JG	Strategize re discovery issues and next steps	0.20 410.00/hr
	KH	Meet with Joe Grekin and Brandi Dobbs re: discovery and research update.	0.20 360.00/hr
2/14/2022	JG	Draft discovery requests re spoliation issue	1.00 410.00/hr
	JG	Exchange correspondence with Anthony re proposed order re motion for possession	0.10 410.00/hr
	JG	Preparation for status conference	0.20 410.00/hr
	JG	Status conference re spoliation issue	1.60 410.00/hr
	JG	Review and revise order re possession motion, draft correspondence to Anthony re same	0.10 410.00/hr
	BB	Review and analyze supplemental document production..	2.80 290.00/hr
2/15/2022	JG	Review notice re sentencing, draft correspondence to Mark re same	0.10 410.00/hr
	JG	Exchange correspondence with Mark re interview with Joe Dumouchelle, review correspondence from Mark to DuMouchelle's lawyer	0.10 410.00/hr
	JG	Review correspondence from Mark re interview with debtor, draft correspondence to debtor's counsel re same	0.10 410.00/hr

		<u>Hrs/Rate</u>	
2/15/2022	JG	Exchange correspondence with counsel for Joe DuMouchelle re informal interview	0.10 410.00/hr
	JG	Review correspondence re litigation funding, draft correspondence to Mark re same	0.10 410.00/hr
	JG	Review and revise discovery requests re spoliation	0.60 410.00/hr
	BB	Draft memorandum regarding analysis of supplemental document review.	1.00 290.00/hr
	JG	Exchange correspondence with opposing counsel re 26f report amended	0.10 410.00/hr
	JG	Review and revise proposed order resolving motion for possession and draft correspondence to Mark re same	0.20 410.00/hr
	JG	Revise 26f report re spoliation issues per scheduling conference	0.20 410.00/hr
2/16/2022	JG	Review correspondence from Mark re order re motion for possession, draft correspondence to opposing counsel re same	0.10 410.00/hr
	JG	Finalize discovery requests re spoliation	0.10 410.00/hr
	JG	Review memoranda from Brandi re documents produced, chart of issues related to spoliation	0.30 410.00/hr
	JG	Zoom with Mark re various issues including status of DuMouchelle sentencing	0.30 410.00/hr
	JG	Draft correspondence to counsel for DuMouchelle re informal meeting	0.10 410.00/hr
2/17/2022	BB	Review and analyze documents produced for completeness.	1.50 290.00/hr
	JG	Call with Mark re scheduling DuMouchelle meeting, draft correspondence re same to counsel for DuMouchelle	0.10 410.00/hr
	JG	Exchange correspondence with DuMouchelle counsel and schedule zoom meeting	0.10 410.00/hr

			Page	46
			<u>Hrs/Rate</u>	<u>Amount</u>
2/18/2022	JG	Review filings of discovery requests, due dates	0.10 410.00/hr	
	JG	Review correspondence from opposing counsel, review order re motion to possession and proposed changes, draft correspondence to Mark re same	0.20 410.00/hr	
	JG	Exchange correspondence with Mark and opposing counsel re order re motion for possession	0.10 410.00/hr	
	JG	Strategize re discovery issues, documents produced and not produced by Zeidman's	0.20 410.00/hr	NO CHARGE
	BB	Additional review and analysis of discovery production.	2.20 290.00/hr	
2/19/2022	JG	Review supplemental discovery from Zeidman's, review memoranda re discovery responses and missing items	0.50 410.00/hr	
	JG	Review and revise order, exchange correspondence with opposing counsel, re possession, cancelling status conference re same	0.20 410.00/hr	
2/20/2022	JG	Exchange correspondence with opposing counsel re stipulated order, follow up re filing of same	0.10 410.00/hr	
2/21/2022	JG	Attention to stipulation for order re possession	0.10 410.00/hr	
2/22/2022	JG	Strategize re documents produced, follow up and next steps	0.60 410.00/hr	NO CHARGE
	BB	Conference with J. Grekin re documents produced in discovery.	0.60 290.00/hr	
2/24/2022	JG	Exchange correspondence with Charles re meeting, timing, next steps	0.10 410.00/hr	
	BB	Conference with JKG and KH re meeting with DuMouchelle.	0.50 290.00/hr	
	JG	Preparation for call with DuMouchelle	0.90 410.00/hr	

			Page	47
			<u>Hrs/Rate</u>	<u>Amount</u>
2/24/2022	BB	Review and analyze documents showing pictures of the Noble Jewelry.	0.30 290.00/hr	
	KH	Assist with preparation for call with J. DuMouchelle.	0.40 360.00/hr	
	JG	Zoom with DuMouchelle and counsel, Zoom with Mark	2.00 410.00/hr	
	KH	Discussion with Mark Shapiro, Joe Grekin and Brandi Dobbs re: nature of payment to Zeidmans and other issues. Follow up email to Joe and Brandi re: information from Bank of America subpoena.	0.50 360.00/hr	NO CHARGE
	BB	Meeting with J. DuMouchelle, M. Shapiro, and JKG.	1.60 290.00/hr	NO CHARGE
	BB	Conference with JKG, KH, and M. Shapiro regarding next steps.	0.40 290.00/hr	NO CHARGE
2/25/2022	JG	Exchange correspondence with Charles	0.10 410.00/hr	
	BB	Begin drafting affidavit of Joseph DuMouchelle.	0.50 290.00/hr	
	BB	Begin drafting additional discovery to Defendants.	0.80 290.00/hr	
2/26/2022	KH	Begin research re: Bene Esse depositions.	0.50 360.00/hr	
	KH	Continue spoliation research.	0.60 360.00/hr	NO CHARGE
	KH	Begin drafting discovery related to wire transfer.	0.50 360.00/hr	
	JG	Call with Charles re various issues - value, conclusions	1.70 410.00/hr	
2/27/2022	JG	Exchange correspondence with Ryan Heilman re protective order	0.10 410.00/hr	

		<u>Hrs/Rate</u>	<u>Amount</u>
2/27/2022	JG	Review correspondence from Heilman re obtaining documents to produce from former counsel	0.10 410.00/hr
	JG	Exchange correspondence with opposing counsel re motion to sell property, draft correspondence to Mark re same	0.10 410.00/hr
	BB	Phone call with JKG and C. Kuperwasser regarding expert analysis.	1.60 290.00/hr
2/28/2022	JG	Review correspondences from Mark and Anthony re motion to sell	0.10 410.00/hr
	JG	Initial review of discovery requests	0.10 410.00/hr
	JG	Strategize re drafting discovery requests and answering discovery requests of defendants'	0.40 410.00/hr
	KH	Attend to matters re: various issue related to discovery needing to be taken, and responding to Defendant's discovery.	0.40 360.00/hr
	BB	Draft Affidavit of Joseph DuMouchelle.	1.80 290.00/hr
	JG	Research re spoliation standard	0.10 410.00/hr
	BB	Review and analyze produced documents with particular attention to radiant diamond rings identified in pleadings.	1.50 290.00/hr
	BB	Phone call to R. Heilman regarding jewelry.	0.10 290.00/hr
	JG	Exchange correspondence with opposing counsel re depositing property into lockbox	0.10 410.00/hr
	BB	Draft discovery requests.	1.30 290.00/hr
3/1/2022	KH	Draft second set of discovery to Zeidmans.	2.10 360.00/hr
	BB	Continue drafting additional discovery requests.	1.00 290.00/hr

		<u>Hrs/Rate</u>	<u>Amount</u>
3/1/2022	BB	Review and analyze second set of discovery requests to Zeidman's.	0.50 290.00/hr
	BB	Review emails from A. Kochis regarding whereabouts of one oval diamond ring.	0.10 290.00/hr
	BB	Email to R.Hielman regarding radiant diamond ring.	0.10 290.00/hr
	KH	Continue research re: case cited during oral argument regarding spoliation.	0.40 360.00/hr
3/2/2022	KH	Continue research and discussion with Joe re: spoliation and identifiable party.	0.50 360.00/hr
	JG	Exchange correspondence with opposing counsel re lockbox	0.10 410.00/hr
	BB	Review and revise additional discovery requests to defendants.	0.70 290.00/hr
3/3/2022	JG	Call with Mark re establishing lockbox for jewelry, exchange correspondence with Anthony re same	0.20 410.00/hr
	JG	Exchange correspondence with opposing counsel re lockbox	0.10 410.00/hr
3/4/2022	JG	Zoom meeting with Charles re various issues, preparation for same	1.30 410.00/hr
	BB	Conference with JKG and C. Kuperwasser.	1.00 290.00/hr
	JG	Review files re produced documents	0.10 410.00/hr
			NO CHARGE
3/7/2022	JG	Review information re wire transfer to Zeidman's	0.20 410.00/hr
	JG	Exchange correspondence with Mark and Ilene re lockbox information	0.10 410.00/hr
	JG	Exchange correspondence with Mark re lockbox, follow up re same	0.10 410.00/hr

		<u>Hrs/Rate</u>	<u>Amount</u>
3/7/2022	JG	Review research re de bene esse depositions	0.10 410.00/hr
	KH	Finalize discovery to Zeidman's.	0.20 360.00/hr
	KH	Continue research re: De Bene Esse Depositions.	1.50 360.00/hr
	BB	Review and revise discovery requests to defendants.	1.30 290.00/hr
	JG	Review pre-sentencing report	0.20 410.00/hr
	JG	Meeting re various issues	0.40 410.00/hr
	KH	Meet with Joe and Brandi re: case status, various issues, next steps.	0.40 360.00/hr
	BB	Conference with JKG and KH regarding various issues and next steps.	0.40 290.00/hr
3/8/2022	JG	Arrangements for lockbox	0.10 410.00/hr
	JG	Strategize re settlement approaches	0.20 410.00/hr
	JG	Draft correspondence to Anthony re safe deposit box	0.10 410.00/hr
	JG	Strategize re protective order	0.10 410.00/hr
	KH	Receive and review Protective Order drafted by Noble counsel, draft revisions, send same to Kochis for review.	1.90 360.00/hr
	JG	Review notice re new trial dates	0.10 410.00/hr
	JG	Review scheduling order	0.10 410.00/hr

		<u>Hrs/Rate</u>	<u>Amount</u>
3/8/2022	DJW Strategize settlement approaches	0.50 590.00/hr	
3/9/2022	JG Review correspondence from Charles re time, follow up re same	0.20 410.00/hr	
	JG Strategize re responses to requests to admit	0.10 410.00/hr	
	KH Begin answering Defendant's Second Interrogatories and RTP and First Request to Admit.	2.20 360.00/hr	
	KH Begin drafting correspondence to Ryan Heilman re: information needed in response to Zeidman's requests to admit.	1.40 360.00/hr	
	JG Strategize re response to requests to admit	0.10 410.00/hr	NO CHARGE
	JG Assist in drafting discovery responses	0.20 410.00/hr	
3/10/2022	JG Exchange correspondence with opposing counsel re safety deposit box	0.10 410.00/hr	
	JG Exchange correspondence with opposing counsel re discovery responses and safety deposit box	0.10 410.00/hr	
	JG Review and revise proposed affidavit of Joe DuMouchelle	0.20 410.00/hr	
	KH Receive and review Kochis changes to Protective Order.	0.20 360.00/hr	
	KH Draft email to Kochis and seperate email to Ryan Heilman and Kochis re; revisions to protective order.	0.20 360.00/hr	
	JG Call with Mark's office and arrangements for paying retainer to Kuperwasser	0.10 410.00/hr	
	JG Review correspondence from Mark's office, call re Kuperwasser fees and retainer	0.10 410.00/hr	
	BB Communication with opposing counsel regarding discovery requests.	0.10 290.00/hr	

		Hrs/Rate	
3/10/2022	BB	Communications with opposing counsel regarding setting up a safety deposit box.	0.10 290.00/hr
3/11/2022	JG	Review various correspondences and strategize re safety deposit box	0.10 410.00/hr
	KH	Finalize research and begin drafting Motion for Bene Esse Depositions.	3.60 360.00/hr
	DJW	Review case status and consideration of settlement approaches	0.30 590.00/hr
3/12/2022	JG	Draft responses to requests to admit re motion for spoliation	0.30 410.00/hr
	JG	Review documents re answers to interrogatories re spoliation	0.60 410.00/hr
	BB	Communications with JKG regarding various discovery items.	0.10 290.00/hr
3/13/2022	JG	Strategize re responses to discovery requests	0.10 410.00/hr
			NO CHARGE
3/14/2022	BB	Review and analyze requests to admit related to GIA reports of Noble Jewelry items.	0.20 290.00/hr
	KH	Email to and from Joe Grekin re: Zeidman's notice of motion to compromise with Noble and claims against Zeidmans.	0.20 360.00/hr
3/15/2022	JG	Strategize re putting jewelry into safety deposit box, procedure and follow up	0.10 410.00/hr
	KH	Continue drafting responses to interrogatories, including identification of responsive documents.	1.90 360.00/hr
	JG	Review correspondences between Noble counsel and Zeidman's counsel re proposed protective order	0.10 410.00/hr
	JG	Review and revise responses to discovery	0.40 410.00/hr
	BB	Conference with JKG regarding case status and next steps.	0.10 290.00/hr

		<u>Hrs/Rate</u>	<u>Amount</u>
3/16/2022	BB Prepare for visit to bank.	0.30 290.00/hr	
	BB Travel to and from bank.	0.60 290.00/hr	
	BB Meeting at Fifth Third Bank re safety deposit box.	1.00 290.00/hr	
3/17/2022	KH Finalize responses to First Request to Admit and Second Interrogatories.	5.30 360.00/hr	
	KH Call with Ryan Heilman re: Noble answers to request to admit letter.	0.20 360.00/hr	
	BB Attention to case status and next steps.	0.10 290.00/hr	NO CHARGE
	JG Strategize re responses to discovery	0.20 410.00/hr	NO CHARGE
3/18/2022	BB REview and analyze requests to produce documents.	0.80 290.00/hr	
	BB Review and analyze opposing counsel's meet and confer letter.	0.10 290.00/hr	
	BB Review and analyze frbp and local rules regarding requirements re discovery responses.	0.20 290.00/hr	
3/19/2022	BB Begin drafting responses to Defendant's second requests for production of documents.	1.40 290.00/hr	
	JG Exchange correspondence with opposing counsel re expert's report, draft correspondence to Mark re same	0.10 410.00/hr	
	JG Review correspondence from opposing counsel demanding revision of discovery answers, draft correspondence to Ryan re same	0.10 410.00/hr	
	JG Review research re spoliation standard	0.20 410.00/hr	
3/20/2022	BB Communication to JKG regarding case status and next steps.	0.20 290.00/hr	

			<u>Hrs/Rate</u>	<u>Amount</u>
3/21/2022	JG	Exchange correspondence with Ryan re Anthony's demand letter re requests to admit	0.10 410.00/hr	
	JG	Strategize re various issues	0.10 410.00/hr	NO CHARGE
	JG	Call with Ryan re subpoena for documents re ownership	0.20 410.00/hr	
	BB	Phone call with R. Heilman.	0.20 290.00/hr	NO CHARGE
	KH	Review and provide comment to responses to RTP.	0.70 360.00/hr	
	JG	Strategize re responses to interrogatories and doc requests	0.10 410.00/hr	NO CHARGE
	BB	Finalize responses to discovery.	2.40 290.00/hr	
	JG	Exchange correspondence with opposing counsel re expert report due dates	0.10 410.00/hr	
3/22/2022	JG	Review correspondences from opposing counsel re expert report adjournment and proposed order, strategize re same, mediation	0.40 410.00/hr	
	JG	Review and revise subpoena to Noble	0.10 410.00/hr	
	JG	Call with Mark re approach for mediation	0.10 410.00/hr	
	BB	Communication with opposing counsel regarding bank appointment.	0.10 290.00/hr	
	BB	Communication with opposing counsel regarding verified interrogatories.	0.10 290.00/hr	
	BB	Draft subpoena to Noble.	1.00 290.00/hr	
3/23/2022	JG	Draft responses to spoliation discovery requests	2.30 410.00/hr	

		<u>Hrs/Rate</u>	<u>Amount</u>
3/23/2022	KH Assist to draft responses to spoliation discovery re: sentencing adjournments and interest in Noble Jewelry.	0.70 360.00/hr	
	JG Initial review of discovery responses and documents produced	0.20 410.00/hr	
	BB Draft response to meet and confer letter.	3.60 290.00/hr	
	JG Draft responses to requests to produce re spoliation, review and revise responses to requests to admit	1.00 410.00/hr	
	BB Draft verification of discovery requests.	0.20 290.00/hr	
3/24/2022	JG Exchange correspondence with expert re responses to discovery requests	0.10 410.00/hr	
	BB Review verification requirement for interrogatories in federal court.	0.20 290.00/hr	
	JG Draft responses to requests to admit and document requests re spoliation	0.60 410.00/hr	
	BB Review and analyze documents potentially responsive to requests for production.	0.70 290.00/hr	
	JG Review notice re status conference	0.10 410.00/hr	NO CHARGE
	BB Finalize verification of responses to interrogatories and send to opposing counsel.	0.20 290.00/hr	
	JG Initiate review of criminal docket	0.10 410.00/hr	NO CHARGE
	JG Review and revised responses to discovery requests	0.20 410.00/hr	
	BB Review and analyze criminal docket for relevant sentencing information and deadlines.	0.50 290.00/hr	
	BB Review and analyze documents produced in discovery.	1.00 290.00/hr	

		<u>Hrs/Rate</u>	<u>Amount</u>
3/24/2022	JG	Review joint submission to extend dates in criminal case, draft correspondence to opposing counsel re same	0.30 410.00/hr
	JG	Initial review of documents produced in discovery and organization of same	0.30 410.00/hr
	JG	Review and revise responses to interrogatories, responses to document requests	0.40 410.00/hr
	JG	Call with Ryan Heilman re responses to discovery requests, other issues	0.40 410.00/hr
	JG	Test organization for review of documents produced by defendants	0.10 410.00/hr
3/25/2022	JG	Review and revise correspondence to opposing counsel re ownership interest of Noble	0.20 410.00/hr
	JG	Review and revise interrogatory responses per Mark's comments, draft correspondence to Mark re same, review and revise responses to requests to admit and document requests, all related to spoliation motion	1.00 410.00/hr
	BB	Review and analyze documents responsive to request for production.	1.00 290.00/hr
	JG	Finalize responses to discovery requests	0.10 410.00/hr
	BB	Review and revise response to letter regarding second set of discovery responses.	0.70 290.00/hr
	BB	Email to J. Larson re affidavit of Joseph DuMouchelle.	0.10 290.00/hr
	JG	Review and revise response to meet and confer letters	0.20 410.00/hr
	BB	Review and finalize response to opposing counsel's meet and confer letter.	0.20 290.00/hr
	BB	Travel to and meet at bank with opposing counsel and Zeidman's to deposit Noble Jewelry.	0.80 290.00/hr

		<u>Hrs/Rate</u>	<u>Amount</u>
3/28/2022	JG	Review correspondence from Mark re ECG responding to doc requests, call with Mark re same	0.20 410.00/hr
	BB	Phone call with JKG regarding document requests to ECG.	0.10 290.00/hr
	BB	Phone call with JKG regarding subpoena.	0.10 290.00/hr
	BB	Phone call with M. Shapiro regarding status of requests to ECG.	0.10 290.00/hr
	BB	Review and analyze various documents regarding ECG and document requests thereto.	0.30 290.00/hr
	BB	Various emails to M. Shapiro regarding documents sought from ECG.	0.20 290.00/hr
3/29/2022	JG	Review correspondence re DuMouchelle's refusal to sign affidavit and draft response	0.10 410.00/hr
3/31/2022	BB	Review and analyze jewelry placed into safe deposit box as compared to discovery responses.	0.80 290.00/hr
4/2/2022	JG	Review order re sale of certain jewelry, review pictures of jewelry placed in escrow	0.10 410.00/hr
	JG	Exchange correspondence with Mark re ECG failure to produce documents	0.10 410.00/hr
4/3/2022	JG	Exchange correspondence with opposing counsel re mediation and dates, draft correspondence to Mark re same	0.10 410.00/hr
	JG	Exchange correspondence with DuMouchelle's counsel re affidavit request	0.10 410.00/hr
	JG	Exchange correspondence with Mark re mediation and adjourning dates, draft correspondence to opposing counsel re same	0.10 410.00/hr
4/4/2022	JG	Exchange correspondence with DuMouchelle's lawyer re affidavit, call re same	0.10 410.00/hr
	JG	Review responses to discovery requests re spoliation motion	0.20 410.00/hr

		<u>Hrs/Rate</u>	<u>Amount</u>
4/4/2022	JG	Strategize re discovery issues, negotiation of order adjourning dates	0.30 410.00/hr
	JG	Exchange correspondence with opposing counsel re order adjourning dates	0.10 410.00/hr
	BB	Strategize with JKG regarding current status and next steps.	0.30 290.00/hr
4/5/2022	JG	Call with counsel for DuMouchelle re affidavit	0.20 410.00/hr
4/6/2022	JG	Review and make proposed revisions to proposed order re adjourning dates and mediation, draft correspondence to Mark re same	0.30 410.00/hr
	JG	Call with Mark re various issues, including stipulation for mediation and adjourning dates, hearings for sale of jewelry, use of expert at mediation	0.50 410.00/hr
	JG	Initial brief review of responses to discovery	0.10 410.00/hr
4/12/2022	JG	Exchange correspondence with Charles re time records for March	0.10 410.00/hr
4/15/2022	JG	Exchange correspondence with opposing counsel re identity of mediator	0.10 410.00/hr
4/18/2022	JG	Review correspondence from opposing counsel re contacting mediator and identity of mediator, draft correspondence to Mark re same	0.10 410.00/hr
	JG	Exchange correspondence with Mark and opposing counsel re approach to Judge Randon	0.10 410.00/hr
4/20/2022	JG	Exchange correspondence with opposing counsel re contacting mediator	0.10 410.00/hr
4/21/2022	JG	Call with Judge Randon's chambers, correspondence to Judge Randon's clerk re request for Judge to mediate case	0.50 410.00/hr
4/22/2022	JG	Call with Ryan re status update, mediation	0.10 410.00/hr

4/26/2022	JG	Exchange correspondence with opposing counsel re identity of mediator and contacting Judge Randon	0.10 410.00/hr
	JG	Call with Anthony to Judge Randon's chambers re mediation	0.10 410.00/hr
	JG	Review subpoena from Zeidman's to Noble, draft correspondence to Mark re mediator identity	0.10 410.00/hr
4/27/2022	JG	Exchange correspondence with opposing counsel re proposed mediator	0.10 410.00/hr
4/28/2022	JG	Draft correspondence to Anthony re mediators	0.10 410.00/hr
	JG	Review correspondence from opposing counsel identifying potential mediator and follow up re same	0.10 410.00/hr
4/29/2022	JG	Exchange correspondence with potential mediator re conflict check	0.10 410.00/hr
	JG	Review correspondence from Anthony re proposed order re mediator, review same, draft response	0.20 410.00/hr
	JG	Review correspondence from potential mediator re disclosures, draft response re same, scheduling initial call	0.10 410.00/hr
4/30/2022	JG	Review correspondences from opposing counsel and mediator re initial mediation call and stipulation	0.10 410.00/hr
5/9/2022	JG	Preparation for initial mediation call, call with opposing counsel and mediator re basic preceudural posture and issues in the case, mechanics of mediation, follow up correspondence to Mark and Charles re same	0.90 410.00/hr
	JG	Review correspondence from opposing counsel re mediation and call with opposing counsel re same	0.20 410.00/hr
	JG	Exchange correspondence with Mark re mediation	0.10 410.00/hr
	JG	Exchange correspondence with Kuperwasser re expert report for mediation	0.10 410.00/hr

		<u>Hrs/Rate</u>	<u>Amount</u>
5/9/2022	BB Premediation phone call.	0.50 290.00/hr	NO CHARGE
	BB Follow up phone call with JKG regarding premediation call.	0.10 290.00/hr	NO CHARGE
5/10/2022	JG Review subpoena to Noble filed by Zeidman's	0.10 410.00/hr	
	JG Exchange correspondence with opposing counsel re response of Noble to subpoenas	0.10 410.00/hr	
	JG Exchange correspondence with Anthony re mediation, production by Noble	0.10 410.00/hr	
	JG Exchange correspondence with mediator re engagement issues, review letters re same from mediator and draft correspondence to Mark re same	0.20 410.00/hr	
	JG Call with Mark re various issues pertaining to mediation`	0.30 410.00/hr	
5/12/2022	JG Call with Ryan Heilman re production of documents, mediation	0.20 410.00/hr	
	JG Exchange correspondence with Charles re expert report, scheduling meeting	0.10 410.00/hr	
	JG Call with opposing counsel re mediation details	0.10 410.00/hr	
	KH Receive and review sentencing memorandum re: dispute over value of harm.	0.20 360.00/hr	NO CHARGE
5/13/2022	JG Exchange correspondence with mediator and opposing counsel re agreement on mediation details	0.10 410.00/hr	
	JG Review order re evidentiary hearing establishing loss range for DuMouchelle sentencing, draft correspondence to Mark re same	0.10 410.00/hr	
	JG Prepare for and call with Charles re expert report	0.50 410.00/hr	
	BB Phone call with C. Kuperwasser regarding expert report.	0.30 290.00/hr	

5/15/2022	JG	Draft correspondence to opposing counsel re revising mediator order	0.10 410.00/hr	
5/17/2022	JG	Exchange correspondence with opposing counsel re consent to file motion to compel	0.10 410.00/hr	
5/18/2022	JG	Review proposed order and exchange correspondence with opposing counsel re same	0.10 410.00/hr	
	BB	Review and analyze motions to compel.	0.60 290.00/hr	
5/20/2022	JG	Exchange correspondence with Anthony re stipulated order, briefly review filing	0.10 410.00/hr	
5/23/2022	JG	Strategize re motion to compel	0.10 410.00/hr	
	BB	Attend to matters re: response date for motion to compel.	0.10 290.00/hr	
5/24/2022	JG	Call w/Brandi and Kim re response to motion to compel	0.50 410.00/hr	NO CHARGE
	JG	Review order re cap required for mediator fees, review proposed order re same and draft correspondence re same	0.10 410.00/hr	
	KH	Call with Brandi and Joe re: response to Motion to Compel and preparation for mediation.	0.50 360.00/hr	NO CHARGE
	BB	Strategize with JKG nd KH regarding motions to compel.	0.40 290.00/hr	NO CHARGE
5/26/2022	JG	Review amended order entered	0.10 410.00/hr	
	KH	Call with Noble and Ryan.	0.70 360.00/hr	
	JG	Assist in drafting response to motion to compel	0.30 410.00/hr	
	KH	Call with Ryan Heilman re: responses to Motion to Compel.	0.30 360.00/hr	

		<u>Hrs/Rate</u>	<u>Amount</u>
5/26/2022	KH	continue drafting response to Zeidman's Motion to Compel.	4.20 360.00/hr
5/27/2022	KH	Review documents and information related to ownership of Noble Jewelry.	0.70 360.00/hr
	KH	Continue research re: rights of bailee to recover for damages to property.	4.10 360.00/hr
	BB	Review documents and confirm their production in discovery.	0.20 290.00/hr
5/31/2022	BB	Research regarding bailee's right to sue.	2.10 290.00/hr
	JG	Review and revise response to motion to compel	0.70 410.00/hr
	KH	Finalize and file response to Zeidman's Motion to Compel.	7.90 360.00/hr
6/1/2022	KH	Phone call with Kristie Tobin re: request for update on lawsuit against Zeidmans. Follow up email re: same.	0.60 360.00/hr
	BB	Email to K. Tobin regarding jewelry placed in safe deposit box.	0.10 290.00/hr
6/2/2022	JG	Review brief in support of Joseph DuMouchelle's request for lower sentence, and exhibits thereto	0.40 410.00/hr
	JG	Review correspondence from litigation funder, draft correspondence to Mark re same	0.10 410.00/hr
6/3/2022	JG	Review Kuperwasser invoice	0.20 410.00/hr
6/6/2022	JG	Exchange correspondence with Mark re possible financing	0.10 410.00/hr
	JG	Review Noble's response to motion to compel	0.10 410.00/hr
	JG	Review and revise invoice	0.20 410.00/hr

			Page 63
			<u>Amount</u>
<u>Hrs/Rate</u>			
6/6/2022 JG	Review notice of hearing re motions to compel	0.10 410.00/hr	NO CHARGE
KH	Call to court re: scheduling of hearing on Motion to Compel.	0.20 360.00/hr	
BB	Conference regarding hearing regarding motion to compel.	0.10 290.00/hr	
6/7/2022 JG	Exchange correspondence with Anthony re date of hearing	0.10 410.00/hr	
BB	Begin drafting expert report.	2.80 290.00/hr	
6/8/2022 JG	Review and revise invoice, draft correspondence to Charles re same	0.20 410.00/hr	
6/9/2022 JG	Review correspondences from Anthony and Ryan re scheduling hearing on motions to compel	0.10 410.00/hr	
JG	Exchange correspondence with opposing counsel re scheduling hearing	0.10 410.00/hr	
JG	Review government's brief re sentencing issues re Joseph	0.10 410.00/hr	
6/10/2022 BB	Finish drafting template of expert report.	2.80 290.00/hr	
BB	Review and analyze motion to adjourn.	0.10 290.00/hr	
6/12/2022 JG	Review correspondence from opposing counsel, draft response re stipulation to move hearing	0.10 410.00/hr	
6/14/2022 JG	Review and comment and suggest revisions to expert report	0.80 410.00/hr	
BB	Continue drafting expert report and next steps.	0.30 290.00/hr	
6/21/2022 JG	Review correspondence from Mark re request from DOJ, review documents re same, call with Mark re same	0.50 410.00/hr	

		<u>Hrs/Rate</u>	<u>Amount</u>
6/21/2022	JG	Exchange correspondences with Karen Reynolds re various issues, review files re information requested by USA	0.40 410.00/hr
	BB	Review and analyze reply re motion to compel.	0.80 290.00/hr
6/22/2022	BB	Prepare for hearing regarding motion to compel.	2.00 290.00/hr
6/23/2022	JG	Strategize re results of hearing	0.10 410.00/hr
	BB	Prepare for hearing.	1.00 290.00/hr
	BB	Attend hearing re motion to compel.	3.40 290.00/hr
6/26/2022	BB	Additional revision of expert report of C. Kuperwasser.	2.10 290.00/hr
6/27/2022	JG	Review and revise expert report	1.20 410.00/hr
	BB	Review and analyze expert report and revise to include timelines for transfer of various stones.	1.40 290.00/hr
	JG	Review and finalize draft of expert report	0.10 410.00/hr
	JG	Draft correspondence to Charles and call with Charles re expert report	0.20 410.00/hr
	BB	Review and analyze stipulated order.	0.10 290.00/hr
	BB	Communication to A. Kochis re stipulated order.	0.10 290.00/hr
6/28/2022	JG	Strategize re various issues, including preparation for mediation and preparation of expert's report	0.30 410.00/hr
	JG	Call with Ryan re mediation, expert report, setting up interview	0.30 410.00/hr

		<u>Hrs/Rate</u>	<u>Amount</u>
6/28/2022	BB	Communication with J. Larson re scheduling a meeting with J. DuMouchelle and expert.	0.20 290.00/hr
	BB	Conference with JKG regarding mediation and next steps.	0.10 290.00/hr
6/30/2022	JG	Attention to expert report and expert interviews	0.10 410.00/hr
7/5/2022	BB	Email to J. Larson regarding meeting with C. Kuperwasser.	0.10 290.00/hr
	BB	Email to R. Heilman regarding meeting with C. Kuperwasser.	0.10 290.00/hr
	BB	Reponse to email from J. Larson regarding meeting with C. Kuperwasser.	0.10 290.00/hr
	BB	Email to C. Kuperwasser regarding expert report and next steps.	0.10 290.00/hr
	BB	Draft mediation brief.	4.70 290.00/hr
7/6/2022	BB	Continue drafting mediation brief.	3.10 290.00/hr
	BB	Communications with R. Heilman re document production.	0.10 290.00/hr
7/7/2022	BB	Email to R. Heilman regarding status of document production.	0.10 290.00/hr
	BB	Follow up email to R. Heilman regarding status of document production.	0.10 290.00/hr
7/8/2022	BB	Email to R. Heilman regarding status of document production.	0.10 290.00/hr
	BB	Follow up email to R. Heilman regarding status of document production.	0.10 290.00/hr
	BB	Phone call to R. Heilman regarding status of document production.	0.10 290.00/hr

		<u>Hrs/Rate</u>	<u>Amount</u>
7/8/2022	BB	Text messages to R. Heilman regarding status of document production.	0.10 290.00/hr
	BB	Phone call with R. Heilman regarding content of document production.	0.10 290.00/hr
	BB	Email from A. Kochis regarding status of document production.	0.10 290.00/hr
	BB	Email to A. Kochis regarding status of document production.	0.10 290.00/hr
	BB	Draft motion to compel document production.	1.70 290.00/hr
	BB	Email to J. Larson re interview with C. Kuperwasser.	0.10 290.00/hr
	BB	Email to C. Kuperwasser re status of expert report.	0.10 290.00/hr
	BB	Begin reviewing documents produced by Noble with particular attention to documents evidencing Noble's interest in jewelry.	1.00 290.00/hr
	BB	Continue drafting mediation brief.	2.00 290.00/hr
7/10/2022	JG	Review Dumouchelle's request for adjournment of sentencing hearing	0.10 410.00/hr
	JG	Review various correspondences	0.20 410.00/hr
7/11/2022	JG	Strategize re preparation for mediation	0.10 410.00/hr
	BB	Finish drafting mediation brief.	3.30 290.00/hr
	BB	Continue reviewing documents produced by Noble, with particular attention to documents evidencing Noble's interest in the jewelry.	2.00 290.00/hr
7/12/2022	JG	Review correspondence re expert report and draft response	0.10 410.00/hr

		<u>Hrs/Rate</u>	<u>Amount</u>
7/12/2022	JG Strategize re expert report	0.10 410.00/hr	NO CHARGE
	JG Review and revise mediation statement	1.10 410.00/hr	
	JG Attention to expert report and modifications	0.10 410.00/hr	
	JG Review expert's changes to report, call with expert re same, additional changes	1.30 410.00/hr	
	BB Continue reviewing documents produced by Noble with particular attention to any document showing Noble's interest in the jewelry.	4.20 290.00/hr	
7/13/2022	JG Review documents produced by Noble	0.20 410.00/hr	
	KH Receive, review and respond to emails from Brandi Dobbs and Joe Grekin re: issues spotted in discovery review.	0.50 360.00/hr	NO CHARGE
	KH Receive, review and respond to email from Kristie Tobin re: status update and mediation.	0.20 360.00/hr	
	KH Brief review of Defendants Omnibus reply re: motion to compel for legal arguments related to conversion.	0.30 360.00/hr	
	KH Assist with supplemental responses to discovery requests.	2.20 360.00/hr	
	BB Review and revise discovery responses.	5.60 290.00/hr	
7/14/2022	KH Receive and review pleadings from criminal case re: sentencing and possible delays.	0.50 360.00/hr	NO CHARGE
7/15/2022	BB Review and revise mediation brief.	5.20 290.00/hr	
7/17/2022	JG Review and revise mediation brief	2.40 410.00/hr	
	JG Review and revise mediation statement	1.20 410.00/hr	

		<u>Hrs/Rate</u>	<u>Amount</u>
7/17/2022	JG Review latest criminal filing - DuMouchelle's filing against lawyer	0.10 410.00/hr	
7/18/2022	JG Review and revise mediation brief	1.60 410.00/hr	
	JG Initial preparation for mediation, strategize re same	0.30 410.00/hr	
	JG Exchange correspondence with Charles re mediation availability	0.10 410.00/hr	
	JG Call with Ryan re participation of Noble in mediation, draft correspondence to Ryan re same	0.40 410.00/hr	
	BB Review and revise mediation brief.	5.50 290.00/hr	
	BB Review exhibits to mediation brief.	0.20 290.00/hr	
	JG Review criminal pleadings re withdrawal of plea and sentencing	0.20 410.00/hr	
	JG Review correspondence from mediator re updated mediation letter, draft correspondence to Mark re same, draft correspondence to Mark re mediation brief	0.10 410.00/hr	
7/19/2022	JG Review DuMouchelle's request for new counsel	0.10 410.00/hr	
	JG Review correspondence from mediator re briefs, conflicts, draft correspondence to Mark re same	0.10 410.00/hr	
	JG Strategize re Noble issues re mediation	0.70 410.00/hr	NO CHARGE
	JG Review opposing party's mediation brief and strategize re same	0.70 410.00/hr	
	JG Exchange correspondence with Ryan re mediation	0.10 410.00/hr	
	JG Meeting with Mark Shapiro preparing for mediation	0.90 410.00/hr	

		<u>Hrs/Rate</u>	<u>Amount</u>
7/19/2022	BB Attend premediation meeting with M. Shapiro and J. Grekin.	0.90 290.00/hr	
	BB Prepare for mediation.	2.50 290.00/hr	
	JJS Strategize with JKG re: mediation and 9019 issues re: Noble	0.60 390.00/hr	
7/20/2022	KH Review Zeidman's response to Subpoenas to assist with mediation. Correspondence with Brandi Dobbs re: same.	1.10 360.00/hr	
	JG Attend mediation	8.60 410.00/hr	
	KH Call with Joe Grekin re: settlement potential and strategy re: Zeidman's litigation.	0.40 360.00/hr	NO CHARGE
	BB Attend mediation.	9.80 290.00/hr	NO CHARGE
7/21/2022	JG Strategy conference re next steps, extending mediation	1.00 410.00/hr	
	JG Strategize re next steps	0.30 410.00/hr	
	JG Call with mediator re next steps	0.20 410.00/hr	
	BB Conference with DJW and JKG regarding mediation, next steps.	1.30 290.00/hr	
	DJW Strategy conference with mediation yesterday, conduct, tone, dynamics, discussions, next steps, approaches going forward, etc.	1.20 590.00/hr	
	DJW Continued strategy conference re: next steps after first day of mediation	0.30 590.00/hr	
7/22/2022	JG Strategize re next steps re settlement strategy	0.20 410.00/hr	
	JG Call with Ryan and Kim re possible acquisition by Noble	0.60 410.00/hr	

		<u>Hrs/Rate</u>	<u>Amount</u>
7/25/2022	JG Call with mediator re next steps re settlement	0.20 410.00/hr	
	JG Review opinion re DuMoucelle's criminal motions	0.20 410.00/hr	
	JG Call with mediator re possible next steps	0.20 410.00/hr	
7/26/2022	JG Review correspondences from Tobin asking for update on mediation, draft response	0.20 410.00/hr	
	JG Call with counsel for ARK re mediation and related issues	0.60 410.00/hr	
	JG Review request for forfeiture judgment	0.10 410.00/hr	
7/27/2022	JG Review correspondences from Anthony and Todd, draft response	0.10 410.00/hr	
	JG Review meet and confer letter, new discovery	0.30 410.00/hr	
	JG Review opinions in criminal case against JD, exchange correspondences with Kristie re value of oval diamond ring	0.40 410.00/hr	
	BB Review and analyze meet and confer letter from A. Kochis.	0.10 290.00/hr	
	BB Review and analyze various orders regarding J. DuMouchelle's criminal case.	0.70 290.00/hr	
	JG Call with Ryan re sentencing hearing	0.10 410.00/hr	
7/28/2022	JG Internal meeting re next steps after mediation	0.50 410.00/hr	
	KH Meeting with Brandi and Joe re: discovery and case preparation.	0.50 360.00/hr	NO CHARGE
	JG Review correspondence from opposing counsel re ownership of jewelry	0.10 410.00/hr	

		<u>Hrs/Rate</u>	<u>Amount</u>
7/28/2022	JG	Review order granting amendment to forfeiture order	0.10 410.00/hr
	JG	Review announcement re DuMouchelle sentencing, draft correspondence to Mark re same	0.10 410.00/hr
	JG	Draft correspondence to counsel for DuMouchelle re interview with expert	0.10 410.00/hr
	JG	Call with Ryan re details and results of sentencing hearing	0.50 410.00/hr
	BB	Zoom meeting with JKG and KH regarding case status and next steps.	0.50 290.00/hr
	BB	Email to R. Heilman regarding additional documents needed for discovery.	0.10 290.00/hr
7/29/2022	JG	Call with Mark re sentencing of JD, subpoenaing documents from DOJ, continuing mediation efforts	0.50 410.00/hr
	JG	Exchange correspondence with counsel for JD re possible zoom meeting with Kuperwasser	0.10 410.00/hr
	BB	Review, analyze, and begin researching responses to Defendant's third set of interrogatories and related discovery requests.	1.00 290.00/hr
	BB	Phone call with R. Heilman and B. Noble regarding documents for production.	0.30 290.00/hr
8/1/2022	JG	Review meet and confer letter from opposing counsel re ownership issue, strategize re same	0.20 410.00/hr
8/2/2022	JG	Call with Anthony and Todd re next steps in mediation, letter, mediation issues	0.70 410.00/hr
	JG	Strategize re response to Anthony re ownership issues, meet and confer	0.20 410.00/hr
	JG	Call with Mark re mediator call and follow up	0.40 410.00/hr
	BB	Phone call with mediator, J. Grekin, and A. Kochis regarding settlement opportunities.	0.50 290.00/hr

8/2/2022	BB	Email to B. Noble regarding need for documents.	0.20 290.00/hr	
	BB	Prepare for blackboard meeting regarding spoliation.	1.90 290.00/hr	
8/3/2022	BB	Respond to meet and confer letter.	1.00 290.00/hr	
8/4/2022	JG	Meeting with Ryan re Noble, settlement, alternatives re going forward	0.90 410.00/hr	
	BB	Review and analyze documents for responsiveness to discovery requests.	3.30 290.00/hr	
8/5/2022	KH	Email to and from Brandi Dobbs re: access to quickbooks to prove insolvency.	0.20 360.00/hr	
8/8/2022	JG	Draft correspondence to mediator re scheduling zoom meeting	0.10 410.00/hr	
	BB	Communication with B. Noble regarding additional documents for discovery.	0.10 290.00/hr	
	BB	Review and analyze additional documents for discovery.	0.60 290.00/hr	
8/9/2022	BB	Review and analyze litigation risk letter from T. Almassian.	1.00 290.00/hr	
	JG	Strategize re insolvency issue, quickbooks	0.30 410.00/hr	
	JG	Strategize re settlement issues	0.20 410.00/hr	
	BB	Conference regarding access to Debtor's quickbooks records.	0.30 290.00/hr	NO CHARGE
	BB	Phone call with A. Kochis regarding discovery, settlement.	0.40 290.00/hr	
8/10/2022	JG	Response to inquiries from opposing counsel re requesting government documents	0.10 410.00/hr	

		<u>Hrs/Rate</u>	<u>Amount</u>
8/10/2022	JG	Prepare for and call with Todd re next steps, settlement issues	0.80 410.00/hr
	BB	Phone call with mediator regarding case status and potential avenues for settlement.	0.80 290.00/hr
8/14/2022	JG	Exchange correspondence with Charles re additional time to be billed, follow up re same	0.10 410.00/hr
8/15/2022	BB	Email to A. Kochis re settlement and documents held by government.	0.10 290.00/hr
	BB	Email to P. Whitlow regarding documents showing ownership of engagement ring.	0.10 290.00/hr
	BB	Review and analyze documents received from P. Whitlow regarding jewelry.	0.20 290.00/hr
	BB	Phone call with A. Kochis regarding documents from the government and settlement.	0.10 290.00/hr
	BB	Prepare responses to discovery requests/	5.60 290.00/hr
8/17/2022	JG	Strategize re settlement issues	0.10 410.00/hr
	BB	Email to P. Whitlow regarding settlement.	0.20 290.00/hr
	BB	Phone call from P. Whitlow regarding ownership of jewelry.	0.10 290.00/hr
	BB	Review and analyze insurance documents from Noble.	0.50 290.00/hr
8/18/2022	JG	Strategize re discovery issues	0.10 410.00/hr
	BB	Email to A. Kochis regarding settlement.	0.10 290.00/hr
8/21/2022	JG	Exchange correspondence with Heilman re possible affidavits from previous consignors	0.20 410.00/hr

		<u>Hrs/Rate</u>	<u>Amount</u>
8/22/2022	JG	Call with opposing counsel re settlement	0.70 410.00/hr
	KH	Begin preparation of trial outline re: causes of action and proofs.	2.40 360.00/hr
	KH	Blackboard causes of action in preparation for continued discovery and trial.	2.10 360.00/hr
	JG	Blackboard causes of action	2.10 410.00/hr
	BB	Email to A. Kochis re settlement.	0.10 290.00/hr
	BB	Blackboard claims and evidence supporting the same.	2.10 290.00/hr
	BB	Phone call with A. Kochis re settlement.	0.80 290.00/hr
	BB	Analyze and outline claims related to spoliation of evidence.	1.90 290.00/hr
8/23/2022	JG	Exchange correspondence with mediator re progress on settlement	0.10 410.00/hr
	JG	Call with Pete Schneider re collecting on restitution	0.30 410.00/hr
	JG	Call with Mark re settlement issues	0.30 410.00/hr
	KH	Research re: conversion damages and strict liability issues.	2.30 360.00/hr
	JG	Strategize re settlement	1.00 410.00/hr
	BB	Prepare discovery responses and related documents for production.	4.80 290.00/hr
8/24/2022	BB	Draft response to Defendant's Third Request for Production.	0.40 290.00/hr

		<u>Hrs/Rate</u>	<u>Amount</u>
8/24/2022	BB	Draft Plaintiff's Second Supplemental Response to Defendant's First Request for Admissions and related Requests for Production.	2.70 290.00/hr
	JG	Review conversion research, and perform additional conversion research, review expert reports and value charts, draft settlement correspondence for client's review	1.80 410.00/hr
	BB	Email to P. Whitlow regarding status of affidavits.	0.10 290.00/hr
	BB	Email to R. Heilman regarding engagement ring.	0.10 290.00/hr
8/25/2022	BB	Finalize discovery production.	0.80 290.00/hr
	JG	Preparation for and conversation with opposing counsel re settlement, draft correspondence to opposing counsel re same, review correspondence from Mark re same	0.30 410.00/hr
	JG	Review correspondence from Mark to USA Karen Reynolds re documents to produce re DuMouchelle	0.10 410.00/hr
	BB	Review email from M. Shapiro regarding government documents.	0.10 290.00/hr
8/26/2022	JG	Attention to responses to discovery	0.10 410.00/hr
	BB	Review and revise responses to discovery.	0.50 290.00/hr
8/28/2022	JG	Exchange correspondence with opposing counsel re responses to discovery requests	0.10 410.00/hr
8/29/2022	JG	Review and revise responses to discovery	0.60 410.00/hr
	BB	Finalize discovery responses.	0.80 290.00/hr
	BB	Email to A. Kochis re discovery responses.	0.10 290.00/hr

		<u>Hrs/Rate</u>	<u>Amount</u>
8/30/2022	BB	Email from M. Shapiro re interrogatories.	0.10 290.00/hr
	BB	Email to M. Shapiro re verification.	0.10 290.00/hr
	BB	Email from T. Almassian re mediation.	0.10 290.00/hr
	BB	Email to A. Kochis re verification.	0.10 290.00/hr
	BB	Review and analyze verification.	0.10 290.00/hr
9/1/2022	JG	Exchange correspondence with mediator re end of mediation and report	0.10 410.00/hr
	JG	Review notice filed by mediator, draft correspondence to opposing counsel re response to settlement offer	0.10 410.00/hr
9/5/2022	JG	Exchange correspondence with Anthony re settlement	0.10 410.00/hr
9/6/2022	JG	Exchange correspondence with opposing counsel re settlement	0.10 410.00/hr
9/7/2022	JG	Call with opposing counsel re settlement	0.20 410.00/hr
9/8/2022	JG	Call with Mark re Zeidman's counter-offer	0.20 410.00/hr
9/12/2022	JG	Call with Mark re counteroffer	0.10 410.00/hr
9/13/2022	JG	Exchange correspondence with Anthony re counteroffer	0.10 410.00/hr
	JG	Exchange correspondence with Mark re government documents from DuMouchelle	0.10 410.00/hr
	JG	Call with opposing counsel re settlement offer	0.30 410.00/hr

		<u>Hrs/Rate</u>	<u>Amount</u>
9/13/2022	JG Strategize re settlement issues, allocation of risk	0.70 410.00/hr	NO CHARGE
	JG Call with Mark re obtaining documents from USA office, settlement issues	0.40 410.00/hr	
	JG Attention to documents held by government, information from docket	0.10 410.00/hr	
9/14/2022	JG Call with Anthony re new settlement offer	0.20 410.00/hr	
9/16/2022	BB Conference with JKG regarding status of settlement and next steps.	0.10 290.00/hr	
	BB Email to C. Kuperwasser regarding meeting at bank to review jewelry.	0.10 290.00/hr	
	BB Email to A. Kochis regarding meeting at bank to review jewelry.	0.10 290.00/hr	
9/19/2022	BB Emails with C. Kuperwasser regarding examination of jewelry at bank.	0.10 290.00/hr	
9/20/2022	JG Review correspondences from Heilman re additional documents produced	0.10 410.00/hr	
9/22/2022	JG Exchange correspondence with Mark re criminal docket entries, settlement status	0.10 410.00/hr	
	BB Email to C. Kuperwasser confirming meeting.	0.10 290.00/hr	
9/23/2022	JG Call with Charles re value of diamonds, time necessary to sell, etc.	0.40 410.00/hr	
	BB Attend meeting at bank to facilitate expert examination of jewelry.	0.80 290.00/hr	
	BB Review and analyze jewelry to send details to C. Kuperwasser.	0.50 290.00/hr	
9/27/2022	JG Call with Heilman re various issues	0.70 410.00/hr	

		<u>Hrs/Rate</u>	<u>Amount</u>
9/27/2022	JG Exchange correspondence with opposing counsel re status of settlement negotiations	0.10 410.00/hr	
9/28/2022	JG Exchange correspondence with Anthony re timing of settlement response, value of jewelry issue	0.20 410.00/hr	
10/1/2022	JG Calls with Mark and opposing counsel re next steps in settlement process	0.40 410.00/hr	
10/4/2022	JG Draft correspondence to Mark re settlement offer, exchange correspondence with Anthony re same	0.30 410.00/hr	
	JG Exchange correspondence with Mark re settlement counter	0.10 410.00/hr	
	JG Exchange correspondences with Mark re counteroffer	0.10 410.00/hr	
10/6/2022	JG Call with Anthony re latest counter	0.20 410.00/hr	
	JG Draft correspondence to Anthony re settlement offer, draft correspondence to Mark re same	0.40 410.00/hr	
10/7/2022	JG Exchange correspondence with Anthony and Mark re latest counter-offer	0.10 410.00/hr	
	JG Call with opposing counsel re questions re latest settlement offer	0.20 410.00/hr	
	JG Call with Mark re opposing party questions re latest settlement offer, procedure for checking value of oval diamond ring	0.20 410.00/hr	
	JG Draft correspondence to Charles re questions re method for determining value of jewelry	0.20 410.00/hr	
10/9/2022	JG Exchange correspondence with Charles re inspection of jewelry	0.10 410.00/hr	
10/10/2022	JG Exchange correspondence with Mark re transporting oval diamond ring for inspection	0.10 410.00/hr	
	JG Call with Anthony re short delay in responding to questions re counter offer	0.10 410.00/hr	

			<u>Hrs/Rate</u>	<u>Amount</u>
10/10/2022	JG	Exchange correspondence with Mark re settlement term re jewelry inspection	0.10 410.00/hr	
10/12/2022	JG	Calls with Mark re coordinating with Charles and questions re inspection of jewelry	0.20 410.00/hr	
	JG	Calls with Charles and Mark re GIA report necessity and procedure for inspection	0.50 410.00/hr	
	JG	Strategize re settlement issues	0.20 410.00/hr	
	JG	Draft proposed order re inspection and adjourning dates	0.30 410.00/hr	
10/13/2022	JG	Draft proposed order permitting inspection of jewelry	0.90 410.00/hr	
	JG	Exchange correspondence with Mark re proposed order re jewelry inspection	0.10 410.00/hr	
	JG	Call with Mark re order re inspecting jewelry	0.10 410.00/hr	
	JG	Review correspondence from Mark and attached order with redlined changes, review changes, call with Mark re same and estimate necessary to settle, draft correspondence to Anthony re order and estimate necessary to settle	0.40 410.00/hr	
10/14/2022	JG	Call with Anthony re proposed order re jewelry inspection	0.30 410.00/hr	
10/16/2022	JG	Exchange correspondence with Mark re jewelry inspection	0.10 410.00/hr	
	JG	Call with Mark re jewelry inspection issues	0.20 410.00/hr	
10/17/2022	JG	Call with opposing counsel re jewelry inspection issues	0.10 410.00/hr	
	JG	Review correspondence from Anthony, review proposed order with Anthony's changes, draft correspondence to Mark re same, next steps	0.20 410.00/hr	

10/17/2022	JG	Exchange correspondences with Mark re proposed order re jewelry inspection, draft correspondence to Anthony re same	0.20 410.00/hr
10/18/2022	JG	Draft correspondence to Charles re inspection order	0.10 410.00/hr
10/19/2022	JG	Exchange correspondences with Charles re inspection order	0.10 410.00/hr
10/20/2022	JG	Review correspondence from Charles re inspection at GIA, draft correspondence to opposing counsel and client re same	0.20 410.00/hr
	JG	Calls with Charles and Mark re proposed jewelry inspection order, lack of ability to inspect at GIA	0.40 410.00/hr
	JG	Call with Anthony re jewelry inspection order	0.10 410.00/hr
	JG	Revise order re jewelry inspection to account for Kupperwasser inspection, draft correspondence to Mark re same	0.50 410.00/hr
10/21/2022	JG	Exchange correspondence with Mark and with Anthony re proposed stipulated order re jewelry inspection	0.10 410.00/hr
	JG	Exchange correspondence with opposing counsel re stipulated order, arrangements re filing of order, draft stipulation	0.30 410.00/hr
10/25/2022	JG	Exchange correspondence with Charles re status of order and call from Noble	0.10 410.00/hr
10/26/2022	JG	Review order setting hearing on stipulation, exchange correspondence with Anthony re same	0.10 410.00/hr
10/28/2022	JG	Call with Charles re arrangements for inspection of jewelry	0.30 410.00/hr
11/1/2022	JG	Call with opposing counsel re hearing re proposed stipulation	0.10 410.00/hr
11/2/2022	JG	Call with Mark re preparation for hearing on stipulation	0.30 410.00/hr
	JG	Preparation for hearing re stipulated order	0.20 410.00/hr

		<u>Hrs/Rate</u>	<u>Amount</u>
11/2/2022	JG Attend hearing re proposed stipulation re jewelry inspection	3.00 410.00/hr	
	JG Attend hearing re jewelry inspection	1.40 410.00/hr	NO CHARGE
11/3/2022	JG Review and revise proposed jewelry inspection order per comments of court, draft correspondence to opposing counsel and Mark re same	0.60 410.00/hr	
	JG Review changes proposed by both opposing counsel and Mark to proposed jewelry inspection order, draft correspondence to Mark re same	0.20 410.00/hr	
	JG Review correspondences from Mark and opposing counsel re jewelry inspection order, draft return correspondences re same	0.10 410.00/hr	
	JG Draft correspondence to Charles re sending mounting to GIA	0.10 410.00/hr	
	JG Exchange correspondence with Charles re sending the mounting to the GIA	0.10 410.00/hr	
11/4/2022	JG Call with Mark re transporting mounting, changes to inspection order, draft changes re same, draft correspondence to opposing counsel and Mark re same	0.40 410.00/hr	
11/5/2022	JG Exchange correspondence with Anthony re form of order re jewelry inspection, draft correspondence to Mark re same	0.10 410.00/hr	
11/6/2022	JG Exchange correspondence with mediator re invoice, draft correspondence to Mark re same	0.10 410.00/hr	
11/7/2022	JG Exchange correspondence with Mark re mediator invoice	0.20 410.00/hr	
	JG Finalize stip and order re inspection of jewelry	0.10 410.00/hr	
11/8/2022	JG Review correspondences from Mark re mediator invoice	0.10 410.00/hr	
11/9/2022	JG Review entered order re jewelry inspection, call with Anthony re same, follow up on schedule issue	0.10 410.00/hr	

			<u>Hrs/Rate</u>	<u>Amount</u>
11/9/2022	JG	Draft correspondences to Mark re addressing issues of security etc. under jewelry inspection order	0.10 410.00/hr	
	JG	Review correspondence from Anthony scheduling jewelry inspection and draft correspondence to Mark re same	0.10 410.00/hr	
	JG	Exchange correspondence with Mark and draft correspondence to Anthony re arrangements to transport oval diamond ring	0.10 410.00/hr	
11/10/2022	JG	Exchange correspondence with Mark, draft correspondence to Charles, re jewelry inspection arrangements	0.10 410.00/hr	
	JG	Review correspondence from Anthony re scheduling issues re jewelry inspection and draft return correspondence, follow up, draft correspondence to Charles re same	0.10 410.00/hr	
11/11/2022	JG	Exchange correspondence with Anthony re jewelry inspection, date to begin same and details, follow up re same and arrange presence of representative	0.10 410.00/hr	
	JG	Call with Charles re jewelry inspection issues	0.30 410.00/hr	
11/17/2022	JG	Call with Mark re various issues including primarily initiating jewelry inspection process	0.20 410.00/hr	
	JG	Strategize with Brandi re initiating jewelry inspection process	0.10 410.00/hr	NO CHARGE
	JG	Strategize re jewelry inspection process - checking with GIA to make sure there is no hold on oval diamond	0.10 410.00/hr	NO CHARGE
	BB	Review and analyze order regarding meeting at the bank.	0.30 290.00/hr	
	BB	Meeting at bank with A Kochis and Zeidmans re shipment of ring.	1.10 290.00/hr	
	BB	Phone call with GIA re flags.	0.40 290.00/hr	
	BB	Draft email to GIA re potential flag.	0.60 290.00/hr	

		<u>Hrs/Rate</u>	<u>Amount</u>
11/21/2022	BB	Email to C Kuperwasser re status of stone and GIA.	0.10 290.00/hr
	BB	Email to Client re status of stone and GIA.	0.10 290.00/hr
	BB	Email to A Kochis re status of stone and GIA.	0.10 290.00/hr
11/30/2022	JG	Exchange correspondence with opposing counsel, draft correspondence to Charles re stone inspection	0.10 410.00/hr
	JG	Call with Charles re next steps re diamond inspection	0.10 410.00/hr
	JG	Call with Mark re next steps in diamond inspection process and related issues	0.20 410.00/hr
	JG	Calls with Charles and opposing counsel re security issue	0.20 410.00/hr
	JG	Call with Ryan re status update	0.40 410.00/hr
12/1/2022	JG	Call with Charles re diamond	0.20 410.00/hr
12/5/2022	JG	Exchange correspondence with Anthony re returning diamond to safe	0.10 410.00/hr
12/8/2022	BB	Email to A. Kochis re bank.	0.10 290.00/hr
12/9/2022	JG	Call with Mark re appraisal of diamond, settlement, next steps	0.40 410.00/hr
	JG	Strategize re settlement options	0.10 410.00/hr
	BB	Email to A Kochis re bank.	0.10 290.00/hr
12/12/2022	JG	Review correspondence from Mark and research attached	0.40 410.00/hr

12/13/2022	JG	Call with Ryan Heilman re settlement issues, appraisal of diamond	0.20 410.00/hr	
	JG	Call with Mark re settlement issues, questions for Noble, calls with Ryan re same	0.30 410.00/hr	
12/14/2022	JG	Review order re scheduling dates	0.10 410.00/hr	
	JG	Call with opposing counsel re settlement issues, next steps	0.50 410.00/hr	
12/15/2022	JG	Exchange correspondence with opposing counsel re GIA report and questions regarding oval diamond and report, draft correspondence to Charles re same	0.20 410.00/hr	
	BB	Meeting at bank with A. Kochis and opposing party.	1.10 290.00/hr	
12/16/2022	JG	Review correspondence from Charles re diamond value and inspection, draft correspondences to opposing counsel and to Mark re same	0.20 410.00/hr	
	JG	Exchange correspondence with Mark re GIA report	0.10 410.00/hr	
12/18/2022	JG	Exchange correspondence with opposing counsel re brink's bill, draft correspondence to Mark re same	0.10 410.00/hr	
12/20/2022	JG	Review letter from opposing counsel re substantive and settlement issues, draft correspondence to Mark re same	0.20 410.00/hr	
	JG	Call with Ryan Heilman re settlement issues, funding issues	0.40 410.00/hr	
12/21/2022	JG	Call with Mark re various issues, including negotiations with Bill Noble and Zeidman's	0.40 410.00/hr	
	JG	Draft correspondence to Charles re request for phone call	0.10 410.00/hr	
	JG	Exchange correspondence with Charles re scheduling call	0.10 410.00/hr	NO CHARGE

		<u>Hrs/Rate</u>	<u>Amount</u>
12/22/2022	JG Strategize with Dan re various issues	0.50 410.00/hr	NO CHARGE
	DJW Strategy conference re: litigation approaches going forward	0.50 495.00/hr	
12/23/2022	JG Call with Charles and Mark, subsequent call with Mark, re oval diamond ring and strategize re next steps and options	0.80 410.00/hr	
1/3/2023	JG Exchange correspondence with opposing counsel re response to communication demanded, strategize re deadlines and various issues related to settlement	0.20 450.00/hr	
	JG Strategize re various issues including settlement, expert report, responding to letter from opposing counsel, compelling production of federal government documents	0.40 450.00/hr	NO CHARGE
	KH Meet with Joe and Brandi re: expert report, settlement potential, possible sale to Noble, turnover of documents from government.	0.40 385.00/hr	NO CHARGE
	BB Strategize re various issues including settlement, expert report, responding to letter from opposing counsel, compelling production of federal government documents	0.40 290.00/hr	NO CHARGE
1/4/2023	DJW Revise draft response to settlement letter	1.20 590.00/hr	
1/5/2023	JG Draft correspondence to Mark re federal documents	0.10 450.00/hr	
	JG Exchange correspondence with Mark re contacting federal government re documents	0.20 450.00/hr	
	JG Draft response to letter from opposing counsel re settlement and legal positions, review mediation brief, previous settlement correspondence, consignment agreement re same	0.80 450.00/hr	
	JG Call with Ryan re Noble position on funding litigation	0.30 450.00/hr	
1/6/2023	JG Call with Mark re settlement issues, Noble offer for limited funding	0.30 450.00/hr	

			<u>Hrs/Rate</u>	<u>Amount</u>
1/6/2023	JG	Review various documents pertaining to value re response to letter from opposing counsel	0.60 450.00/hr	
	JG	Draft correspondence to opposing counsel re status of response to settlement letter	0.10 450.00/hr	
1/9/2023	JG	Draft response to letter from opposing counsel	1.10 450.00/hr	
	JG	Strategize re response to Kochis letter, case strategy, settlement issues and spoliation	0.50 450.00/hr	
	JG	Strategize re expert report re spoliation	0.40 450.00/hr	
	JG	Review and revise response to Kochis letter	0.40 450.00/hr	
	DJW	Revise draft response to settlement letter and strategize settlement issues	1.20 590.00/hr	
	BB	Review and analyze letters, consider revisions.	1.60 290.00/hr	
1/11/2023	JG	Call with Mark re various issues, including subpoena to government	0.20 450.00/hr	
	JG	Call with Heilman re interest in purchasing oval diamond ring	0.10 450.00/hr	
	JG	Call with opposing counsel re settlement	0.10 450.00/hr	
	JG	Call with opposing counsel re settlement offer	0.20 450.00/hr	
	JG	Draft correspondence to Mark re latest settlement offer	0.20 450.00/hr	
	JG	Strategize re latest settlement offer	0.20 450.00/hr	
	JG	Strategize re settlement offer, waterfall, various obligations	0.20 450.00/hr	NO CHARGE

		<u>Hrs/Rate</u>	
1/11/2023	JJS Strategize with JKG re: settlement	0.20 430.00/hr	NO CHARGE
1/12/2023	JG Exchange correspondences with Mark re production of federal documents and settlement offer	0.10 450.00/hr	
	JG Call with Mark re settlement proposal	0.30 450.00/hr	
	DJW Review revised settlement offer, potential impact and potential response and discussion with Trustee	0.50 590.00/hr	
1/13/2023	JG Review agreement with Noble and settlement waterfall	0.40 450.00/hr	
	JG Draft correspondence to Mark re settlement	0.10 450.00/hr	
	JG Strategize re settlement	0.10 450.00/hr	
	DJW Attend to proposed settlement ideas, approaches and strategies	0.50 590.00/hr	
	DJW Identify alternative settlement approaches	0.50 590.00/hr	
1/16/2023	JG Preparation for meeting with Mark re settlement issues	0.90 450.00/hr	
	JG Meeting with Mark re settlement issues, potential issues with sale of jewelry	1.60 450.00/hr	
	BB Draft expert report of Charles Kuperwasser re spoliation.	4.60 290.00/hr	
1/17/2023	JG Call with opposing counsel re counter-offer	0.20 450.00/hr	
	JG Call with Mark re counter-offer made and reaction to same	0.10 410.00/hr	
1/18/2023	JG Call with opposing counsel re settlement offer	0.20 410.00/hr	

		<u>Hrs/Rate</u>	<u>Amount</u>
1/18/2023	JG Review local rules re settlement	0.10 410.00/hr	
1/19/2023	JG Call with Mark Shapiro re settlement	0.20 450.00/hr	
	JG Call with Anthony agreeing to settlement and strategizing re next steps	0.10 450.00/hr	
	JG Call with Ryan re settlement	0.20 450.00/hr	
	JG Exchange correspondence with opposing counsel re notice of settlement and review same	0.10 450.00/hr	
1/20/2023	JG Call with counsel for Ritter	0.30 450.00/hr	
	JG Draft correspondence re sale of oval diamond ring and information re same	0.30 450.00/hr	
	JG Strategize re production of documents	0.10 450.00/hr	NO CHARGE
1/25/2023	JG Draft settlement agreement, stipulations and orders as exhibits	3.90 450.00/hr	
	JG Draft assignment	0.80 450.00/hr	
	JG Draft correspondence to Mark re settlement agreement	0.10 450.00/hr	
	JG Draft motion to compromise	0.40 450.00/hr	
1/26/2023	JG Draft motion to compromise	0.80 450.00/hr	
	JG Draft motion to compromise	1.20 450.00/hr	
	JG Review and revise settlement agreement, call with Mark re same, draft correspondence to opposing counsel re same	0.30 450.00/hr	

		<u>Hrs/Rate</u>	<u>Amount</u>
1/26/2023	JG Draft correspondence to Mark re motion to compromise	0.10 450.00/hr	
1/27/2023	JG Exchange correspondences with Mark re 9019 motion and settlement agreement, draft correspondence to Anthony re 9019 motion	0.10 450.00/hr	
1/30/2023	JG Exchange correspondence with Anthony re 9019 motion	0.10 450.00/hr	
1/31/2023	JG Calls with opposing counsel and Mark re 9019 motion	0.40 450.00/hr	
2/3/2023	JG Review correspondence from opposing counsel, review of proposed changes to settlement docs and 9019 motion	0.60 450.00/hr	
2/5/2023	JG Exchange correspondence with Charles re status of case	0.10 450.00/hr	
	JG Review changes proposed to 9019 motion by opposing counsel and propose changes back, draft correspondence to Mark re same, draft correspondence to Anthony re same	0.60 450.00/hr	
	JG Review opposing counsel's changes to settlement agreement and propose changes to same	0.30 450.00/hr	
2/6/2023	JG Exchange correspondence with opposing counsel re 9019 motion	0.10 450.00/hr	
	JG Exchange correspondence with Mark re 9019 motion	0.10 450.00/hr	
	JG Review proposed revisions to settlement agreement from opposing counsel and comment on same	0.50 450.00/hr	
	JG Draft correspondences to Mark and to opposing counsel re settlement agreement proposed changes	0.20 450.00/hr	
2/7/2023	JG Exchange correspondence with opposing counsel re settlement agreement	0.10 450.00/hr	
	JG Draft proposed changes to settlement agreement, draft correspondence to opposing counsel and Mark re same	0.60 450.00/hr	

		<u>Hrs/Rate</u>	<u>Amount</u>
2/8/2023	JG	Call with opposing counsel re settlement agreement and 9019 motion	0.90 450.00/hr
	JG	Call with Mark re negotiations on settlement agreement	0.20 450.00/hr
2/14/2023	JG	Review Anthony's changes to settlement agreement, draft proposed changes and comments	0.90 450.00/hr
2/15/2023	JG	Call with Mark re settlement agreement status of negotiations, releases	0.10 450.00/hr
2/16/2023	JG	Call with opposing counsel re settlement agreement final (hopefully) proposed changes	0.20 450.00/hr
2/17/2023	JG	Call with Heilman re release of Noble in settlement agreement	0.10 450.00/hr
2/19/2023	JG	Review proposed changes to settlement agreement from opposing counsel, draft correspondence re same to Mark	0.30 450.00/hr
2/20/2023	JG	Exchange correspondence with Mark re settlement agreement, final review of changes to same, draft correspondence to opposing counsel re same	0.20 450.00/hr
2/21/2023	JG	Exchange correspondence with Anthony re next steps re settlement	0.10 450.00/hr
	JG	Call with Anthony re settlement agreement, approaching Noble, draft correspondence to Heilman re same, draft correspondence to Anthony re motion	0.20 450.00/hr
2/22/2023	JG	Exchange correspondences with Heilman and opposing counsel re settlement agreement	0.10 450.00/hr
2/23/2023	JG	Call with Ryan Heilman and opposing counsel re: settlement agreement	0.20 450.00/hr
2/24/2023	JG	Call with Ryan Heilman re: settlement agreement	0.40 450.00/hr
2/26/2023	JG	Exchange correspondence with Anthony, draft correspondence to Mark, re safe deposit box renewal	0.10 450.00/hr

		<u>Hrs/Rate</u>	
2/27/2023	JG	Call with Ryan and Bill Noble re settlement agreement	1.00 450.00/hr
	JG	Exchange correspondence with opposing counsel and Mark re renewing safety deposit box	0.10 450.00/hr
	JG	Call Mark re proposal from Noble re oval diamond ring	0.20 450.00/hr
2/28/2023	JG	Review settlement agreement, review assignment agreement, draft correspondence to Mark re proposal by Noble re oval diamond ring	0.40 450.00/hr
	JG	Review opposing counsel's proposed changes to 9019 motion, draft correspondence to Mark re same	0.10 450.00/hr
	JG	Call with Ryan Heilman re proposal re oval diamond ring	0.10 450.00/hr
	JG	Draft correspondence to opposing counsel re 9019 motion	0.10 450.00/hr
	DJW	Discuss settlement issues re: approaches and Noble matters	0.30 590.00/hr
	JG	Discuss settlement issues re: approaches and Noble matters	0.30 450.00/hr
3/6/2023	JG	Draft correspondence to Heilman re reaction to settlement agreement	0.10 450.00/hr
3/10/2023	JG	Call with Heilman re payment of Bill out of estate settlement	0.20 450.00/hr
	JG	Call with Heilman re Noble offer to settle waterfall	0.20 450.00/hr
3/13/2023	JG	Review correspondence from Anthony, review calculations re settlement with Noble, call Mark re same	0.30 450.00/hr
	JG	Call with Heilman re settlement with Noble	0.10 450.00/hr
	DJW	Strategize settlement approaches and Bill Noble positions	0.30 590.00/hr

NO CHARGE

		<u>Hrs/Rate</u>	<u>Amount</u>
3/13/2023	DJW Attend to potential financing efforts	0.80 590.00/hr	
3/15/2023	JG Call with opposing counsel re status of negotiations with Noble	0.10 450.00/hr	
3/22/2023	JG Review file re Bill Noble offer, draft correspondence to Mark (and to Ryan) re same	0.50 450.00/hr	
	JG Strategize re motion for settlement, related issues, negotiations	0.20 450.00/hr	NO CHARGE
3/23/2023	JG Calls with Mark and Heilman re settlement with Noble	0.20 450.00/hr	
	JG Strategize re coverage on vacation	0.10 450.00/hr	NO CHARGE
	JG Exchange correspondence with counsel for insurance company re status of settlement	0.10 450.00/hr	
	JG Draft correspondence to Heilman re settlement response	0.10 450.00/hr	
3/24/2023	JG Calls with Ryan re status of settlement offer	0.20 450.00/hr	
	BB Call with JKG re case status and next steps.	0.10 290.00/hr	
3/28/2023	BB EM w/ A. Kochis re settlement.	0.10 290.00/hr	
	BB EM to R. Heilman regarding status of settlement negotiations.	0.10 290.00/hr	
	BB Call with A. Kochis re settlement	0.20 290.00/hr	
3/29/2023	BB EM from R. Heilman re settlement.	0.10 290.00/hr	
	BB Email to M. Shapiro re settlement.	0.10 290.00/hr	

		<u>Hrs/Rate</u>	<u>Amount</u>
3/29/2023	BB EM to R. Heilman re settlement.	0.10 290.00/hr	
3/31/2023	BB Email to M. Shapiro re settlement.	0.10 290.00/hr	
	BB Email from M. Shapiro re settlement.	0.10 290.00/hr	
	BB Email to R. Heilman re settlement.	0.10 290.00/hr	
4/3/2023	JG Draft correspondence to Heilman re next steps, modification of 9019 motion	0.10 450.00/hr	
	JG Call with Anthony re preparation for final pretrial conference and settlement with Noble	0.10 450.00/hr	
	JG Strategize re modifying 9019 motion to add settlement with Noble	0.10 450.00/hr	NO CHARGE
	JG Call with opposing counsel re final pretrial conference	0.10 450.00/hr	
	BB EM from A. Kochis re settlement.	0.10 290.00/hr	
	BB Revise 9019 Motion to incorporate settlement with B. Noble.	1.50 290.00/hr	
4/4/2023	JG Call with Mark re status update, hearing re status	0.20 450.00/hr	
	JG Hearing re joint pretrial/status conference	1.50 450.00/hr	
	JG Review and revise 9019 motion re Noble Agreement	0.40 450.00/hr	
4/5/2023	JG Review notice of status conference	0.10 450.00/hr	
	JG Call with Ryan Heilman re settlement, 9019 motion, status conference	0.20 450.00/hr	

		<u>Hrs/Rate</u>	<u>Amount</u>
4/5/2023	JG	Review of changes to 9019 motion, draft correspondences to counsel and Mark re same	0.20 450.00/hr
4/7/2023	JG	Review correspondences from Heilman, opposing counsel, and Mark re motion to compromise, make suggested changes to same, draft correspondence to all re changes	0.40 450.00/hr
	JG	Exchange correspondence with counsel re 9019 motion	0.10 450.00/hr
	JG	Exchange correspondence with counsel re executing settlement agreement	0.10 450.00/hr
	JG	Draft correspondence to counsel re execution of settlement agreement	0.10 450.00/hr
4/10/2023	JG	Call with Mark re motion to compromise and execution of settlement agreement	0.10 450.00/hr
	JG	Call with Heilman, exchange correspondence with opposing counsel, draft correspondence to Mark re execution of settlement agreement	0.20 450.00/hr
4/11/2023	JG	Exchange correspondence with Mark, draft correspondence to Heilman re settlement agreement execution	0.10 450.00/hr
	JG	Exchange correspondence with opposing counsel re motion to compromise and execution of settlement agreement	0.10 450.00/hr
4/12/2023	JG	Exchange correspondence with Heilman and opposing counsel re execution of settlement agreement and filing of motion to compromise	0.10 450.00/hr
	JG	Attention to preparation and filing of 9019 motion	0.20 450.00/hr
	JG	Draft correspondence to opposing counsel re service issue	0.10 450.00/hr
	JG	Attention to filing and service on motion, notice, order, exhibits	0.30 450.00/hr
	JG	Call with Mark's office re required redaction, address same, motion and order re same	0.50 450.00/hr
			NO CHARGE

		<u>Hrs/Rate</u>	<u>Amount</u>
4/13/2023	JG	Review correspondence from Jay Welford re questions re settlement, draft response, review file re answers	0.40 450.00/hr
	JG	Review 9037 re motion to redact, modifications to same, review correspondence from court re same	0.70 450.00/hr
	JG	Call with court clerk re filing of motion for compromise and removing status conference from docket	0.20 450.00/hr
	JG	Address service issues re motion to compromise	0.30 450.00/hr
4/14/2023	JG	Review docket re motion to compromise, motion to restrict access, call with opposing counsel re same	0.40 450.00/hr
	JG	Call with judge's office re motion to compromise, canceling April 28 conference	0.10 450.00/hr
	JG	Call with Mark re service issues	0.10 450.00/hr
4/16/2023	JG	Exchange correspondences with opposing counsel re service issues, notification to court re motion to compromise	0.10 450.00/hr
4/19/2023	JG	Begin working on fee application	0.20 450.00/hr
4/20/2023	JG	Initial preparation of fee application	0.40 450.00/hr
	DJW	Assist in drafting fee application	0.20 590.00/hr
	JG	Draft fee application	0.70 450.00/hr
4/21/2023	JG	Continue drafting fee application	0.10 450.00/hr
4/24/2023	JG	Draft fee application	1.30 450.00/hr
4/25/2023	JG	Review notice from court canceling April 28 hearing	0.10 450.00/hr

		<u>Hrs/Rate</u>	<u>Amount</u>
4/25/2023	JG Draft fee application	0.10 450.00/hr	
	DJW Strategize preparation for motion for settlement and concurrence from Zeidman's counsel	0.20 590.00/hr	
4/26/2023	JG Call with Anthony re filing concurrence	0.20 450.00/hr	
4/27/2023	JG Calls with Heilman re contact with Charles, call with Charles re same	0.20 450.00/hr	
4/28/2023	JG Call with Cheryl London re status conference cancellation, draft correspondence to Anthony re same	0.10 450.00/hr	
5/1/2023	JG Strategize re status of fee application and motion to compromise	0.10 450.00/hr	NO CHARGE
5/8/2023	JG Draft fee application	1.30 450.00/hr	
	JG Review file re certificate of no response timing	0.10 450.00/hr	
	JG Review certificate of no response	0.10 450.00/hr	NO CHARGE
5/10/2023	JG Exchange correspondence with creditor re status of motion to compromise	0.10 450.00/hr	
	JG Call with creditor re value of Oval Diamond Ring	0.30 450.00/hr	
5/15/2023	JG Call with Court re CNR, status	0.10 450.00/hr	
	JG Exchange correspondence with opposing counsel re status of 9019 motion	0.10 450.00/hr	
5/19/2023	JG Review NOH re motion to compromise	0.10 450.00/hr	
5/22/2023	JG Exchange correspondence with opposing counsel re preparation for hearing on motion to compromise	0.10 450.00/hr	

		<u>Hrs/Rate</u>	<u>Amount</u>
5/23/2023	JG	Call with Mark re hearing on motion to compromise, various related issues	0.20 450.00/hr
5/25/2023	JG	Call with Anthony re preparation for hearing	0.20 450.00/hr
5/30/2023	JG	Prepare for and participate in hearing on motion to compromise	2.40 450.00/hr
	JG	Call with opposing counsel re implementing settlement agreement	0.10 450.00/hr
	JG	Call with Heilman re next steps, delivery of oval diamond ring to Noble	0.20 450.00/hr
5/31/2023	JG	Call with Mark re settlement approval and next steps, transferring jewelry	0.30 450.00/hr
	JG	Review settlement agreement for requirements after approval and orders from Court approving same and dismissing case	0.20 450.00/hr
	JG	Call with Anthony re transfer of jewelry	0.10 450.00/hr
	JG	Attention to fee application for expert	0.10 450.00/hr
	JG	Call with Heilman re transport of oval diamond, arrangements	0.20 450.00/hr
	JJS	Strategize issues with JKG re: expert witness fee application	0.10 430.00/hr
6/1/2023	JG	Attention to fee applications	0.10 450.00/hr
	JG	Exchange correspondence with opposing counsel and Mark re wire transfer	0.10 450.00/hr
	KH	Assist to draft S&W Fee Application.	0.40 385.00/hr
	JG	Exchange correspondence with Mark's office and Heilman re check to Noble	0.10 450.00/hr

		<u>Hrs/Rate</u>	<u>Amount</u>
6/1/2023	JG	Call with Heilman re arranging for transfer of oval diamond ring, draft correspondence to Kochis re same	0.10 450.00/hr
6/2/2023	JG	Review correspondence from Kochis and draft correspondence to Kochis and Heilman re jewelry transfer	0.10 450.00/hr
	JG	Exchange correspondence with Kochis and Heilman re jewelry transfer	0.10 450.00/hr
6/6/2023	JG	Assist in revising fee application	0.30 450.00/hr
	KH	Continue drafting Fee Application.	2.20 385.00/hr
6/7/2023	KH	Continue drafting Fee Application	0.40 385.00/hr
6/8/2023	KH	Finalize S&W Fee Application for Adversary Proceeding.	1.60 385.00/hr
6/12/2023	JG	Review and revise fee application	0.80 450.00/hr
	JG	Calls re jewelry transfer with Ryan and Mark	0.20 450.00/hr
	BB	Draft receipt of Oval Diamond Ring.	0.30 290.00/hr
	BB	Attend meeting at bank to transfer jewelry, oversee transfer of assets to Noble and Trustee.	3.50 290.00/hr
	BB	Draft Receipt regarding oval diamond ring.	0.20 290.00/hr
	BB	Email to A. Kochis re transfer of oval diamond ring.	0.10 290.00/hr
6/13/2023	JG	Review correspondence from opposing counsel re stipulation and order dismissing, review settlement agreement and assignment re same, draft response	0.20 450.00/hr
	JG	Review and revise fee application	0.50 450.00/hr

		<u>Hrs/Rate</u>	<u>Amount</u>
6/19/2023	JG	Attention to fee application and revisions, steps going forward on same	0.20 450.00/hr
6/20/2023	KH	Finalize S&W Fee App and send to client for review.	1.50 385.00/hr
6/21/2023	JG	Call with Mark re fee application	0.30 450.00/hr
	JG	Review and revise fee application per Mark's specifications	0.20 450.00/hr
	JG	Assist in drafting fee application for Kuperwasser	0.20 450.00/hr
6/23/2023	JG	Attention to Kuperwasser fee application	0.10 450.00/hr
6/29/2023	JG	Attention to Kuperwasser fee application, time records	0.20 450.00/hr
7/5/2023	JG	Strategize re Kuperwasser fee application	0.10 450.00/hr
	JG	Draft correspondence to Charles re fee application	0.10 450.00/hr
	BB	Begin drafting fee application for expert.	1.30 290.00/hr
7/6/2023	JG	Exchange correspondence with Charles re fee application	0.10 450.00/hr
7/8/2023	BB	Review and revise application for fees of expert to reflect updated costs and fees.	0.40 290.00/hr
7/11/2023	JG	Review and revise Kuperwasser fee application	0.80 450.00/hr
	BB	Review and revise fee application.	0.50 290.00/hr
7/12/2023	JG	Draft correspondence to Charles re fee application draft	0.10 450.00/hr

		<u>Hrs/Rate</u>	<u>Amount</u>
7/12/2023	JG Exchange correspondence with Charles re fee application	0.10 450.00/hr	
7/13/2023	JG Review and revise fee application for Kuperwasser re request of Charles	0.20 450.00/hr	
	JG Finalize Kuperwasser application re changes requested by client	0.70 450.00/hr	
7/14/2023	JG Draft correspondence to Mark re Kuperwasser fee application	0.10 450.00/hr	
7/16/2023	JG Exchange correspondence with Mark re fee application Kuperwasser, follow up re same	0.10 450.00/hr	
7/17/2023	JG Strategize re fee applications status	0.10 450.00/hr	NO CHARGE
7/18/2023	JG Finalize fee applications	0.20 450.00/hr	NO CHARGE
7/19/2023	JG Attention to filing fee applications	0.20 450.00/hr	NO CHARGE
	For professional services rendered	<u>915.00</u>	<u>\$293,883.50</u>

User Summary

Name	Hours	Rate	Amount
BRANDI BLASSES	191.10	290.00	\$55,419.00
BRANDI BLASSES	114.20	280.00	\$31,976.00
BRANDI BLASSES	33.00	0.00	\$0.00
DANIEL J. WEINER	10.90	590.00	\$6,431.00
DANIEL J. WEINER	0.50	495.00	\$247.50
DANIEL J. WEINER	3.90	485.00	\$1,891.50
DANIEL J. WEINER	0.30	0.00	\$0.00
DAWN PERFECT - LAW CLERK	1.00	160.00	\$160.00
JEFFERY SATTLER	5.30	330.00	\$1,749.00
JEFFERY SATTLER	0.30	0.00	\$0.00
JOHN J. STOCKDALE, JR.	0.10	430.00	\$43.00
JOHN J. STOCKDALE, JR.	0.60	390.00	\$234.00
JOHN J. STOCKDALE, JR.	0.20	0.00	\$0.00
JOSEPH GREKIN	54.30	450.00	\$24,435.00
JOSEPH GREKIN	149.50	410.00	\$61,295.00
JOSEPH GREKIN	72.30	395.00	\$28,558.50
JOSEPH GREKIN	28.80	0.00	\$0.00
KIM HILLARY	29.20	385.00	\$11,242.00
KIM HILLARY	66.10	360.00	\$23,796.00
KIM HILLARY	130.90	345.00	\$45,160.50
KIM HILLARY	13.90	0.00	\$0.00
MICHAEL E. BAUM	0.50	485.00	\$242.50
NANCY MACK - PARALEGAL	2.70	170.00	\$459.00
NANCY MACK - PARALEGAL	3.40	160.00	\$544.00
NANCY MACK - PARALEGAL	2.00	0.00	\$0.00

EXHIBIT

6



Daniel J. Weiner, Co-Founder and Senior Partner
40950 Woodward Avenue, Suite 100
Bloomfield Hills, Michigan 48304
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F: 248.971.1547
dweiner@schaferandweiner.com

PRACTICES

Bankruptcy and Reorganizations
Commercial Law
Commercial Litigation

In 1985, Mr. Weiner co-founded Schafer and Weiner, PLLC with the late Arnold Schafer and grew this firm into a nationally recognized force of talented and creative problem solvers for debtors and creditors of all shapes and sizes. Now approaching its 37th year of excellence, Schafer and Weiner sets the standard for law firms of any size with unparalleled commitment, creativity and results.

Mr. Weiner grew up in the courtroom earning special trial awards at Hofstra University School of Law and soon litigated complex cases for multinational automotive suppliers, publicly traded retailers, gaming conglomerates and developers. Mr. Weiner learned to leverage his courtroom skills with his willingness to outwork his adversaries to achieve remarkable results, whether in the courtroom or at the negotiating table.

Mr. Weiner soon channeled these energies into the arena of business reorganizations, gaining outstanding outcomes for Chapter 11 Debtors, Unsecured Creditors' Committees, secured lenders and trustees. While by no means limited to the manufacturing sector, his tactical insights into the automotive supply chain regularly lead to results beyond expectations.

To continually sharpen his skills, Mr. Weiner often publishes and lectures to professionals and valued clients. He writes as a contributing author for the Turnaround Management Association, Journal of Corporate Renewal - Co-author (*When the New Sheriff Comes to Town: Michigan's Emergency Manager Law*, June, 2014), and (*Auto Industry Changes Threaten Delicately Balanced System*, Spring 2009), co-author for The Institute of Continuing Legal Education (*Litigation in Bankruptcy Court, Handling Consumer and Small Business Bankruptcies in Michigan* 2009), co-author for the Collier Bankruptcy Practice Guide (*Partnership and Partner Bankruptcies* 2006), contributing author to *Bankruptcy and Its Impact on LLC Membership Interests*, published by The Institute of Continuing Legal Education, 2006 LLC & Business

Entity Update, and co-author for the *Michigan Business Law Journal* (*Swords and Shields – Prepayment Premiums In and Out of Bankruptcy* 2003).

ADMISSIONS & QUALIFICATIONS

State Bar of Michigan, 1980

U.S. District Court, Eastern District of Michigan, 1980

The Florida Bar, 1983

U.S. Court of Appeals, Sixth Circuit, 1987

U.S. District Court, Western District of Michigan, 1992

U.S. District Court, Northern District of Indiana, 2005

U.S. District Court, District of Colorado, 2021

EDUCATION

Hofstra University School of Law, J.D. 1980

Michigan State University Honors College, B.A., High Honors, 1977

SEMINARS

June, 2015, panel participant at ABI 22nd Annual Central States Bankruptcy Workshop presenting: *Critical Concepts for Avoiding Lender Liability (What All Lenders Should Know)*.

October, 2014, presenter at AutoConnect in Nashville, Tennessee: Financial Trends in the Industry from the Lens of Legal, Lender and Private Equity.

September, 2013, panel participant as supplier counsel at Turnaround Management Association MidAmerican Regional Conference presenting: Shifting Gears in Restructuring: From Automotive to Health Care and Government.

March, 2013, panel participant as debtor's counsel at Association for Corporate Growth/Turnaround Management Association, presenting: To Sell or not to Sell? That's the \$363mm (Section 363) Bankruptcy Question.

May, 2010, speaker to The Michigan Association of Certified Public Accountants' Mega Conference, presenting *Helping the Fox Count the Hens – a CPA's Role in Chapter 11*.

March, 2010, acted as debtor's counsel in a presentation to the Turnaround Management Association on Middle Market Reorganization: *The Nine Lives of Middle Market Re-Org*.

October, 2009, moderator at Automotive Supplier Finance Summit: *Auto Suppliers' Perspectives on the Market*.

October, 2007, speaker at International Forum on Automotive Industry Topics sponsored by Export Development Canada: *Legal Terms and Conditions: What you don't read CAN hurt you; Adding Insult to Injury: What's Your Preference?*

September, 2006, speaker at International Forum on Automotive Industry Topics sponsored by Export Development Canada: *Surviving Automotive Credit Roulette ... Strategies to Increase Recoveries of Insured Canadian Exporters to the U.S. Automotive Industry.*

January, 2006, lecturer to Institute of Continuing Legal Education: *2006 LLC & Business Entity Update.*

October, 2004, speaker at International Forum on Automotive Industry Topics sponsored by Export Development Canada and PricewaterhouseCoopers: *Get (a) Lien and Mean: Asserting and Enforcing Liens on Molds and Tools under Michigan Law.*

April, 2004, speaker to Turnaround Management Association Detroit Chapter: *Use of an Expert Witness in Bankruptcy Court.*

October, 2003, speaker to Burglar and Fire Alarm Association of Michigan Fall Conference: *Iron Rules for Failure ... Everything You Need to do to be Unsuccessful!*

June, 2003, speaker to Export Development Canada/Deloitte & Touche Automotive Roundtable: *Lien On Me – How To Do It Under Michigan Law.*

October, 2002, speaker to Export Development Canada: *If It Looks Like Trouble ...*

April, 2002, speaker to Young Entrepreneurs' Organization and World Entrepreneurs' Organization: *Covering Your A\$\$et\$.*

June, 2000, appointed to Mediation Panel of the United States Bankruptcy Court for the Eastern District of Michigan.

November, 1999, speaker to National Association of Credit Management: *Bankruptcy or Work Out – What's Your Preference?*

September, 1999, speaker to Stout Risius Ross:

- *Turning Opposition into Opportunity*
- *Accountants Representing Parties in Chapter 11 Cases – How Do I Get Paid?*
- *Cash Collateral, Adequate Protection and Post-Petition Financing – Show Me the \$\$\$\$*

April, 1999, speaker to Detroit Bar Association: *Laboring Under the Employment of Bankruptcy and ERISA: Understanding the Interplay.*

June, 1997, speaker to Federal Bar Association Bankruptcy Section: *Financially Troubled Auto Suppliers.*

May, 1989, speaker to Michigan State Medical Society: *Defensive Planning: Protecting Your Assets in Michigan's Liability Climate.*

March, 1989, speaker to Wayne County Medical Society: *Protected Assets & Permissible Transfers*.

April, 1988, lecturer to Institute of Continuing Legal Education: *Representing the Debtor in a Chapter 7 Case*.

September 1, 1987, appointed Special Assistant Attorney General to represent Michigan Department of Transportation in highway condemnation matters.

August, 1987, lecturer to St. Joseph's Hospital, Surgery Department: *Bankruptcy Considerations in Light of Medical Malpractice*.

PUBLICATIONS

Daniel J. Weiner & Jeffrey J. Sattler, *Unforgiven No Longer: Ninth Circuit BAP Authorizes Discharge of Old Tax Debt from Untimely Returns*, 35 Am. Bankruptcy Institute Journal 7, July 2016 (cover story)

Author, *Lender Liability – Easy to Claim, Not So Easy to Discovery (PSST – Look over Here ...)*. Presented at *Critical Concepts for Avoiding Lender Liability (What All Lenders Should Know)*, ABI 22nd Annual Central States Bankruptcy Workshop, June 2015.

Co-author, *When the New Sheriff Comes to Town: Michigan's Emergency Manager Law*, Turnaround Management Association, June 2014.

Co-author, *Auto Industry Changes Threaten Delicately Balanced System*, Turnaround Management Association, spring 2009.

Co-author, *Litigation in Bankruptcy Court, Handling Consumer and Small Business Bankruptcies in Michigan*, The Institute of Continuing Legal Education (2009).

Contributing author, *Partnership and Partner Bankruptcies*, Collier Bankruptcy Practice Guide, Release 73, Chapter 20, Nov. 2006.

Contributing author, *Bankruptcy and Its Impact on LLC Membership Interests*, The Institute of Continuing Legal Education, 2006 LLC & Business Entity Update.

Co-author, *Swords and Shields – Prepayment Premiums In and Out of Bankruptcy*, The Michigan Business Law Journal, fall 2003.

PUBLISHED CASES

In re Live Primary, LLC, 626 B.R. 171; 2021 Bankr LEXIS 459 (Bankr SDNY, Mar. 1, 2021).

In re Energy Conversion Devices, Inc., 483 B.R. 119 (Bankr. E.D. Mich. 2012).

In re Energy Conversion Devices, Inc., 474 B.R. 503 (Bankr. E.D. Mich. 2012).

Simon v. Gerdau MacSteel, Inc. (In re Am. Camshaft Specialties, Inc.), 444 B.R. 347 (Bankr. E.D. Mich. 2011).

Dery v. Cumberland Cas. & Sur. Co. (In re 5900 Assocs., Inc.), 468 F.3d 326 (6th Cir. 2006).

Buffalo Molded Plastics, Inc. v. Omega Tool Corp. (Buffalo Molded Plastics, Inc.), 344 B.R. 394 (Bankr. W.D. Pa. 2006).

In re Nartron Corp., 330 B.R. 573 (Bankr. W.D. Mich. 2005).

Strach v. Casino Windsor, 351 F. Supp. 2d 641 (E.D. Mich. 2004).

McClarty v. Colletta (In re D.C.T., Inc.), 295 B.R. 236 (Bankr. E.D. Mich. 2003).

In re D.C.T., Inc., 283 B.R. 442 (Bankr. E.D. Mich. 2002).

Malone v. Windsor Casino Ltd., 14 Fed. Appx. 634 (6th Cir. 2001).

Int'l Bhd. of Teamsters, AFL-CIO v. Kitty Hawk Int'l, Inc. (In re Kitty Hawk, Inc.), 255 B.R. 428 (Bankr. N.D. Tex. 2000).

Shue & Voeks, Inc. v. Amenity Design & Mfg., Inc., 511 N.W.2d 700 (Mich. Ct. App. 1993).

In re Grand Traverse Dev. Co. Ltd. P'ship, 151 B.R. 792 (W.D. Mich. 1993).

Grand Traverse Dev. Co. Ltd. P'ship v. Brd. Trs. Gen. Ret. Sys. of Detroit (In re Grand Traverse Dev. Co. Ltd. P'ship), 150 B.R. 176 (Bankr. W.D. Mich. 1993).

In re Grand Traverse Dev. Co. Ltd. P'ship, 147 B.R. 418 (Bankr. W.D. Mich. 1992).

In re Mt. Pleasant Ltd. P'ship, 144 B.R. 727 (Bankr. W.D. Mich. 1992).

Noveck v. Miller, 752 F. Supp. 817 (E.D. Mich. 1990).

Bassey & Selesko, P.C. v. Condon, 694 F. Supp. 327 (E.D. Mich. 1988).

In re Dealer Support Servs. Int'l, Inc., 73 B.R. 763 (Bankr. E.D. Mich. 1987).

PROFESSIONAL MEMBERSHIPS

American Bankruptcy Institute

Export Development Canada

Federal, American Bar Associations (Member, Section on Litigation)

State of Michigan Bar Association

The Turnaround Management Association

PRIOR EXPERIENCE

October 15, 1984 – October 14, 1985, Law Offices of Daniel J. Weiner and of counsel to Arnold Schafer, P.C.

May, 1980 – October 15, 1984, Associate, Hertzberg, Jacob & Weingarten, P.C.

OTHER DISTINCTIONS

Voted the 2023 “Lawyer of the Year” for Bankruptcy and Creditor Rights/Insolvency and Reorganization Law in Troy, Michigan by The Best Lawyers in America.

Selected for inclusion as one of Michigan’s Top Business Attorneys – *Crains’ Detroit Business*® (September 2022).

Honored with the Inaugural Lifetime Achievement Award, Turnaround Management Association (Detroit Chapter), May, 2022.

Received the Martindale-Hubbell Peer Review “AV Preeminent” Rating for Legal Ability & Ethical Standards (1990 - 2023).

Selected for inclusion in the *Michigan Super Lawyers*® list, a peer review survey that selects the top 5% of attorneys (2007 - 2022); Selected for inclusion in *Super Lawyers* – Corporate Counsel Edition – July, 2009 (Business Services).

Selected for inclusion in The Best Lawyers in America (2014 - 2023), the oldest and most respected peer-review publication in the legal profession.

Selected for inclusion in Leading Lawyers Advisory Board, as a Leading Lawyer for 2022, a peer-review publication in the legal profession.

Received Oakland County Bar Association Award Honoring 40 Years of Legal Service, October, 2020.

Selected for inclusion in *DBusiness Magazines’ list of Top Lawyers* for 2015, 2016 and 2017.

June 2000 appointed to Mediation Panel of the United States Bankruptcy Court for the Eastern District of Michigan (continuing).

April 1, 1986 appointed, but did not serve, as Federal Bankruptcy Trustee for Eastern District of Michigan.

Phi Beta Kappa; Phi Kappa Phi.

INTERESTS

Collecting wine, improving his golf game and playing in a Klezmer band. He's also a Tigers, Red Wings, Lions and Pistons sports nut.

MOTTO

The Art of War – Sun Tzu Principles:

One hundred victories in one hundred battles is not the most skillful.
Subduing the other's military without battle is the most skillful.



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PRACTICES

Bankruptcy Law
Commercial Law

Two years after Schafer and Weiner, PLLC was founded, the late Arnold Schafer and Daniel Weiner extended an invitation to Mr. Baum to join the firm and assist with its growth.

Nearly three decades later, the firm enjoys an excellent national reputation with a broad range of national and local clients involving insolvency, bankruptcy and litigation. The roster includes automotive suppliers, hospitals, health care facilities, auto dealerships, gaming entities and real estate developers.

Mr. Baum has a reputation for unbridled creativity. He is known to both formulate and implement answers and solutions in many challenging and difficult situations.

Balancing his toughness in a courtroom, Mr. Baum is well regarded as an expert in workouts with superb negotiating skills. As counsel to debtors, trustees, unsecured creditors' committees and secured creditors, Mr. Baum has worked diligently and consistently to obtain results beyond the expectations of clients. In addition to being a contributing editor to the *American Bankruptcy Institute Journal*, Mr. Baum has also published articles for the *Michigan Real Property Review* and the *Michigan Practitioner Series*. He has also lectured in many seminars sponsored by numerous professional associations including the ABI.

Mr. Baum has served on the Advisory Committee to the U.S. Bankruptcy Court for the Eastern District of Michigan and currently serves as the chairperson of the Rules Subcommittee. Additionally, Mr. Baum is the Co-Chair of the Mediation Panel of the U.S. Bankruptcy Court for the Eastern District of Michigan.

ADMISSIONS & QUALIFICATIONS

State Bar of Michigan, 1978
U.S. District Court, Eastern District of Michigan, 1980
U.S. District Court, Western District of Michigan, 1980
U.S. Court of Appeals, Sixth Circuit, 1990
U.S. Tax Court, 2001
U.S. Court of Appeals, Fourth Circuit, 2003
U.S. District Court, Southern District of Texas

EDUCATION

Wayne State University, J.D., 1978
Beth Yehuda Rabbinical College, Ph.D., 1976
Wayne State University, B.S., Computer Science with Distinction, 1974

PUBLICATIONS

Unpaid FICA in Chapter 11: Navigating the Minefield, 38 Mich. Bus. L.J. (official publication of the State Bar of Michigan), Spring 2018

Leading Corporate Turnaround How Leaders Fix Troubled Companies By: Stuart Slatter, David Lovett and Laura Barlow, *Reviewed by: Contributing Editor Michael E. Baum, Esq.*, American Bankruptcy Institute Journal, July, 2013

Distress to Success: A Survival Handbook for Struggling Business and Buyers of Distressed Opportunities By: Bobby Guy, *Reviewed by: Contributing Editor, Michael E. Baum, Esq.*, American Bankruptcy Institute Journal, February, 2012

Cybernotice: The Next Frontier in Court Efficiency, *Written by: Contributing Editor Michael E. Baum, Esq.*, American Bankruptcy Institute Journal, July / August, 2004

Schafer, Baum & McWhorter, Michigan Practitioner's Series: Family Law and Practice, Divorce and Bankruptcy Law, Chp. 9, West. Pub. 1997

Author, *Bankruptcy v Assignment of Rents: A Case to be Decided*, 19 Mich Real Prop Rev 7, 1992

PROFESSIONAL MEMBERSHIPS

Rules Advisory Committee to the U.S. Bankruptcy Court – E.D. (Mich.), Co-Chairperson

American Bankruptcy Institute; Former Contributing Editor

American Bar Association Sections on Business Law, General Practice, Litigation
19-56239-lsg Doc 307 Filed 07/21/23 Entered 07/21/23 10:58:50 Page 142 of 171

Mediation Panel, U.S. Bankruptcy Court, Eastern District of Michigan, Co-Chairperson

State Bar of Michigan Sections on Business Law, Real Property, Bankruptcy, Debtor/Creditor Rights Committee

Wayne State University Law School Moot Court Board; Director of Oral Advocacy, 1978

OTHER DISTINCTIONS

Certified Specialist, Business Bankruptcy Law, American Board of Certification.

Foreign Languages: Hebrew and Bankruptcy

Selected for inclusion in the Leading Lawyers Magazine (2014-2018), a recognized peer-review publication in the legal profession

Selected for inclusion in the *Michigan Super Lawyers*® list, a peer review survey that selects the top 5% of attorneys (2007-2021)

Received the Martindale-Hubbell Peer and Judiciary Review “AV Preeminent” Rating for Legal Ability and Ethical Standards (2004-2021)

Adjunct Professor at University of Detroit – School of Business
Strategic and Legal Bankruptcy Course
September through December 2012

SEMINARS

CBA Event: The Business of Being in the Business (of Bankruptcy)
September 20, 2012, Peking House, Royal Oak, Michigan

3rd Annual Consumer Bankruptcy Institute
Individual Chapter 11 Cases: A How-To Guide
May 11, 2012, The Inn at St. John’s, Plymouth, Michigan

U.S. Bankruptcy Court Mediation Training
U.S. Bankruptcy Court, Eastern District of Michigan
November 19, 2010

2009 Detroit Consumer Bankruptcy Conference at a Glance
The Special Challenges of High-Income Debtors
(including the Means Test and Individual Chapter 11 Cases)
November 11, 2009



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PRACTICES

Bankruptcy Law
Business Litigation
Commercial Law
Debtor/Creditor Rights
Receiverships

Joseph Grekin is an experienced litigator, negotiator and counselor, with expertise in commercial, bankruptcy, receivership and general insolvency issues. Mr. Grekin specializes in representing clients at a tactical or financial disadvantage, using creative and novel methods and arguments to fight tenaciously and professionally to achieve favorable results for his clients.

Mr. Grekin has represented businesses, individuals, and receivers for nearly twenty-five years in state, federal, bankruptcy, appellate and administrative courts in several states. He has extensive experience managing large and complex files, including commercial and bankruptcy litigation, bankruptcy issues, and receivership practice relating to tens of millions of dollars.

In particular, Mr. Grekin has been a cutting-edge advocate in the field of debtor/creditor issues in the litigation context, and has successfully advocated for his clients in several published cases on a wide variety of issues. He has extensive trial experience on commercial and insolvency issues, which makes him an able negotiator and advisor not just in litigation, but in other commercial and bankruptcy venues as well, from business formation to insolvency counseling. Mr. Grekin is a member of the National Association of Federal Equity Receivers.

ADMISSIONS & QUALIFICATIONS

State Bar of Michigan, 1995

U.S. District Court, Eastern District of Michigan, 1996

U.S. District Court, Western District of Michigan, 2004

U.S. Court of Appeals, Sixth Circuit, 1996

U.S. Court of Appeals, Second Circuit, 2018

EDUCATION

University of Michigan Law School, J.D., cum laude, 1994

University of Michigan, B.A., with honors and high distinction, 1991

SEMINARS

May 2021, presenter at Oakland County Bar Association, *We Can Work It Out: Receiverships In The Age Of Covid-19 And Beyond*

August 2019, presenter for Detroit Bar Association, *Receiverships Racing Forward – What's Around the Next Curve?*

July 2018, moderated panel at NAFER Offshore Insolvency and Asset Recovery Conference in Chicago on cross-border insolvency and comparisons between Chapter 11 bankruptcies and Cayman insolvency proceedings

April 2018, presenter at Oakland County Bar Association, *Seeking Injunctive and Other Equitable Relief in Business Court*

November 2016, presenter at Oakland County Bar Association, *Cutting Edge Topics in Fraudulent Transfer Law*

On-Demand Webcast, 2015 - ICLE Presentation – *Handling Contract Disputes*

October 2013, presenter, Schafer and Weiner, PLLC, *What They Don't Tell You – The Secrets to Being a Great Expert Witness*

May 2010, presenter at Mega Conference, The Michigan Association of Certified Public Accountants, *Helping the Fox Count the Hens – A CPA's Role in Chapter 11*

November 2009, presenter at Mega Conference, The Michigan Association of Certified Public Accountants' Financial Planning and Advanced Federal Tax Conference, *Tax Issues with Bankruptcy*

2001-02, guest lecturer, Pennsylvania State University, *The Art of Rhetoric and Argument*

PUBLICATIONS

Co-author, *Commercial Real Estate Receivership*, 38 Mich. Bus. L.J. 3 (official publication of the State Bar of Michigan), Fall 2018

Co-author, *Applying Claim Preclusion in Michigan: A Call for Clarity*, 36 Mich. Bus. L.J. 1 (official publication of the State Bar of Michigan), Spring 2016

Co-author, *Think You Know the Common Interest Privilege? Guess Again!*, 36 Mich. Bus. L.J. 1 (official publication of the State Bar of Michigan), Spring 2016

Co-author, *Expert Witnesses in Bankruptcy: Avoiding a Trap for the Unwary*, 34 Mich. Bus. L.J. 2 (official publication of the State Bar of Michigan), Summer 2014

PUBLISHED CASES

Simon v. ASIMCO Techs., Inc. (In re Am. Camshaft Specialties, Inc.), 410 B.R. 765 (2009)

Delta Engineered Plastics, LLC v Autolign Mfg. Group, Inc., 286 Mich App 155; 777 NW2d 502 (2009)

Mayco Plastics, Inc. v. TRW Vehicle Safety Sys., Inc. (In re Mayco Plastics, Inc.), 389 B.R. 7 (Bankr. E.D. Mich. 2008)

Stocker v Tri-Mount/Bay Harbor Bldg. Co., Inc., 268 Mich App 194; 706 NW 2d 878 (2005)

Guzzo v Thompson, 393 F.3d 652 (6th Cir. 2004)

Bradacs v Jacobone, 244 Mich 263; 625 NW 2d 108 (2001)

Bartell v Lohiser, 25 F.3d 550 (6th Cir. 2000)

Chmielewski v Xermac, Inc. 457 Mich 593; 580 NW 2d 817 (1998)

REPRESENTATIVE MATTERS

Obtained jury verdict in excess of \$1.35 million against client's treasurer on the basis of conversion and fraud despite limited documentation due to efforts by treasurer, who controlled the books of the company, to conceal his actions.

Defended appraiser in lawsuit seeking over \$1,000,000 in damages in federal court based on allegations of fraud, breach of fiduciary duty, conversion and conspiracy; the Court dismissed the case without a trial based on Mr. Grekin's motion.

Represented single-asset real estate Chapter 11 debtor in proceeding to determine whether the debtor's plan of reorganization was feasible, prevailed in evidentiary hearing despite debtor's

19-56239-lsg Doc 307 Filed 07/21/23 Entered 07/21/23 10:58:50 Page 146 of 171

inability as of the date of the hearing to make payments to the lender going forward as required by the Bankruptcy Code, and assisted in obtaining subsequent favorable settlement with lender.

Counsel for federal equity receiver over operating manufacturer with \$20 million in annual gross sales, advised on continuance of operations, marketing, sales, and prosecution of potential claims.

Defense of real estate developers in multiple actions by lenders based on guaranties and promissory notes, negotiated settlements reducing debt by over \$10 million without permitting any collection proceedings against clients.

Counsel to a large pension trust fund in the foreclosure of a \$10 million resort development in northern Michigan, successfully defending against counterclaims alleging lender liability and establishing priority of the trust's mortgage over multiple construction liens.

Brought adversary proceeding as special counsel to Chapter 7 trustee against corporate parent of bankrupt automotive supplier based on preferences, fraudulent transfers and substantive consolidation which resulted in a seven-figure settlement and the likely distribution to all unsecured creditors of 100 cents on the dollar for all approved claims.

In an action on behalf of a toolmaker which contracted with a now bankrupt tier two automotive supplier to build tools for a tier one supplier, where typical mold builder lien claims were potentially defective, brought action against tier one automotive supplier based on novel agency theory; settled for about 60 cents on the dollar.

Represented Chapter 7 trustee in various matters related to the liquidation of the assets of a nursing home, including but not limited to the evaluation of and drafting objections to claims, and providing counsel regarding complex adversary proceeding prosecuted by special counsel.

Represented business owner in preparing and filing a Chapter 7 bankruptcy proceeding, successfully negotiated settlement with the Chapter 7 trustee in which business owner was able to retain ownership of business, which provided business owner with employment and salary, all while discharging substantial unsecured debts.

Defended prominent local businessman in lawsuit brought by lender based on alleged defaults under loan documents, brought counterclaim against lender for conversion of cashier's checks, and negotiated settlement whereby client received payment from lender.

PROFESSIONAL MEMBERSHIPS

American Bar Association

National Association of Federal Equity Receivers

Oakland County Bar Association

State Bar of Michigan

State Court Civil Mediator

OTHER DISTINCTIONS

Chairman of the Debtor/Creditor Committee, which received the Award for the Committee of the Year 2017 from the Oakland County Bar Association (2014-2017)

Received the Martindale-Hubbell Peer Review "AV Preeminent" Rating for Ethical Standards and Legal Ability (2014, 2017)

Selected for inclusion in *Top Lawyers in Metro Detroit* by D Business (2011, 2013)

Selected for inclusion in the *Michigan Super Lawyers*® list, a peer review survey that selects the top 5% of attorneys (2011, 2014-2017)

Former Member Board of Directors, Motor City Brass Band

Former Member, Ferndale Chamber of Commerce

Former Member, Continuing Legal Education Committee of the Oakland County Bar Association

Former Volunteer, Farmington Downtown Development Authority

Volunteer judge for the University of Michigan First Year Moot Court Competition

INTERESTS

Music

Mr. Grekin performed in hundreds of venues as a trombone player for several musical groups, primarily in the Metro Detroit area. Mr. Grekin was honored to participate in the following musical groups, among others:

The Motor City Brass Band

The Klezmaniaks

The Michigan Alumni Pep Band

The Michigan Basketball Band

The Michigan Marching Band

Running and Fitness

Mr. Grekin has competed in and finished three half-marathons and dozens of 10k races in the Metro Detroit area, most recently the 10k at the 40th annual Dexter-Ann Arbor Run. Mr. Grekin has also biked through several European countries, primarily with his gorgeous wife,

Motto

“Let your plans be dark and impenetrable as night, and when you move, fall like a thunderbolt.”

Sun Tzu, *The Art of War*



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PRACTICES

Bankruptcy
Business and Transaction Law
Commercial Litigation
Debtor/Creditor Law
Real Estate

John J. Stockdale, Jr. practices in the areas of bankruptcy, debtor/creditor, real estate, business transactions and related litigation. John has represented clients in business and personal bankruptcies, buy and sell side business and commercial transactions and workouts; real estate transactions and foreclosures; and debt collection and defense. John has represented clients in a variety of industries including, without limitation, building trades, food service, and retail.

John focuses his practice on small and mid-size businesses. He understands and has special insight into the issues affecting those businesses because, for the twelve (12) years prior to joining Schafer and Weiner, he owned and operated a publishing company providing business valuation and lost profits case law reports to attorneys and accountants. John is a member of the American Bankruptcy Institute and a member of Michigan State Bar, Business Law Section.

ADMISSIONS & QUALIFICATIONS

State Bar of Michigan, 2008

U.S. District Court, Eastern District of Michigan, 2008

U.S. District Court, Western District of Michigan, 2012

U.S. Sixth Circuit Court of Appeals, 2020

John has also been admitted *pro hac vice* in courts across the United States including South Carolina, Iowa, Texas, and California.

EDUCATION

Thomas M. Cooley Law School, J.D., summa cum laude, 2008

The Citadel, the Military College of South Carolina, B.A., 1992

SEMINARS

John is an adjunct professor at Western Michigan University's Thomas M. Cooley Law School, where he teaches secured transactions.

Additionally, John presented on the following topics at the United States Bankruptcy Court for the Eastern District of Michigan, Southern Division's Chapter 11 Roundtable on November 4, 2016: (1) filing requirements when a debtor owns a subsidiary or affiliated business (FRBP 2015.3 and Form 26); (2) investing debtor-owned funds (11 U.S.C. 345); and (3) the effect of listing "unknown" on a debtor's schedules.

John has presented to the Michigan Association of Certified Public Accountants on recent court decisions involving business valuation and damage calculations. Most recently, John was a panelist at the Michigan Association of Certified Public Accountants' Anti-Fraud, Litigation & Business Valuation, and Mergers & Acquisitions Conference in Livonia, Michigan on May 24, 2016. John presented on the topic of *Skepticism from Audits, to Forensics, to Valuation*, which discussed an accounting expert's application of skepticism concepts in business valuation and bankruptcy matters.

PUBLICATIONS

Unpaid FICA in Chapter 11: Navigating the Minefield, 38 Michigan Business Law Journal (Spring 2018)

Applying Claim Preclusion in Michigan: A Call for Clarity, 36 Michigan Business Law Journal 1 (Spring 2016)

In re Till: Efficient Markets and the Prime-Plus Formula in 'Cram-Down' Interest Rate Cases, *The Value Examiner*, January/February, 2013

Analyzing a Professional's Personal Goodwill under Chapter 7 of the Bankruptcy Code: Just Whose Asset Is It? BVR's Guide to Personal v Enterprise Goodwill (BVR 2010)

Temple v United States: More Negative Treatment for the Quantitative Marketability Discount Model, *Michigan Tax Lawyer*, State Bar of Michigan, Fall, 2006

REPORTED CASES

United States v. Central Processing Services, LLC (In re Central Processing Services, LLC), 2020 U.S. Dist. Lexis 49387 (E.D. Mich. 2020)

United States v. Central Processing Services (In re Central Processing Services, LLC), 2020 U.S. Dist. Lexis 171061 (E.D. Mich. 2020)

United States v. Central Processing Services (In re Central Processing Services, LLC), 2020 U.S. Dist. Lexis 171260 (E.D. Mich. 2020)

In re Central Processing Services, LLC, 611 B.R. 563 (Bankr. E.D. Mich. 2019)

In re Central Processing Services, LLC, 606 B.R. 710 (Bankr. E.D. Mich. 2019)

In re Central Processing Services, LLC, 607 B.R. 625 (Bankr. E.D. Mich. 2019)

DPT Holdings, LLC v. VLF Auto., 2019 Mich. Cir. Lexis 824 (Oakland County Circuit Court)

SKG International, Inc. v. SKG Italia, S.p.A., et al, 2017 U.S. Dist. Lexis 100647 (E.D. Mich. 2017)

In re St. James Nursing & Physical Rehab. Ctr., Inc., 559 B.R. 186 (Bankr. E.D. Mich. 2016)

In re Associated Community Services, Inc., 520 B.R. 650 (Bankr. E.D. Mich. 2014)

RC Leasing v. Viking Medical Supply, 2014 Mich. Cir. Lexis 105 (Oakland County Circuit Court)

In re D & W, Ltd., LLC, 467 B.R. 427 (Bankr. E.D. Mich. 2012)

REPRESENTATIVE MATTERS

Chapter 11 Bankruptcies

In re Authentiki, LLC, et al. (Bankr. W.D. Mich. 2020) (Counsel for Debtors), John represented the debtors in these Subchapter V, Chapter 11 Cases and through the Coronavirus Pandemic. As a result of John's efforts, the Debtors confirmed a consensual plan of reorganization that substantively consolidated the Debtors and provided an approximately 52% distribution to the unsecured creditors while maintaining 52 jobs in a boutique, tiki-themed, Grand Rapids restaurant.

In re Inspired Concepts, LLC (Bankr. E.D. Mich. 2020) (Counsel for Unsecured Creditors Committee), John represented the unsecured creditors committee in this chapter 11 case

involving twelve restaurants throughout Michigan. As a result of John's efforts, the unsecured creditors distribution increased from zero to ten percent on a junior secured basis.

In re Dream Big Restaurants, LLC (Bankr. D. S.C. 2019) (Counsel for Debtor), John represented the Debtor in this chapter 11 case involving the sale of eight McDonald's franchises in Greenville and Greer, South Carolina through a confirmed plan of liquidation. As a result of John's efforts, equity avoid nearly \$10 million personal guaranty liability related to the franchise agreement, bank debt, and merchant cash advances.

In re Central Processing Services, LLC (Bankr. E.D. Mich. 2019) (counsel for Debtor), John represented the Debtor in this dismissed chapter 11 case involving a mail fulfillment business servicing the charitable fundraising industry. This case involved significant federal tax issues and generated six written opinions favorable to the Debtor.

In re BCDG, LP (Bankr. S.D. Iowa 2016) (Counsel for Unsecured Creditors Committee), John represented the unsecured creditors committee in this chapter 11 case involving the quick sale of six McDonalds franchises in Des Moines, Iowa. First, John successfully negotiated a \$170,000 contribution to the unsecured creditors from the purchaser of the franchises. Then, John negotiated with the various creditor consistencies to craft and confirm a consensual plan of liquidation that brought in an additional \$183,000 from the senior secured lender and reduced the claim pool from \$12 million to \$4.1 million. John's efforts ensured that the unsecured creditors received a meaningful distribution where the debtor did not contemplate any distribution to the unsecured creditors in this bankruptcy case.

In re St. James Nursing & Physical Rehab. Ctr., Inc. (Bankr. E.D. Mich. 2016) (Counsel for Debtor), John successfully represented the debtor throughout the chapter 11 reorganization case of this nursing home through a contested confirmation hearing involving nine objections to confirmation.

In re Associated Community Services, Inc. (Bankr. E.D. Mich. 2014) (Counsel for Debtor) John represented a telephone call center having more than 800 employees throughout the chapter 11 process from preparing first day motions through confirmation of a plan of reorganization. This case involved significant corporate restructuring including relocating the business operations during the bankruptcy case. Additionally, the case involved millions of alleged unpaid withholding tax liabilities which were successfully negotiated to permit secured and priority tax payments to exceed the five-year maximum set by the bankruptcy code. Moreover, John successfully opposed a class action claim reducing the unsecured creditors pool by \$10,000,000.

In re Electric Transportation Engineering Corporation (Bankr. D. Ariz. 2014) (Counsel for Unsecured Creditors Committee) John assisted the committee by providing advice on the intersection between securities law exemptions and exemptions from securities laws available under the Bankruptcy Code. This advice was provided in connection with taking the debtor private pursuant to a contemplated plan of reorganization.

In re Acme Acres (Bankr. E.D. Mich. 2013) (Counsel for Debtor) John represented four related corporate debtors in these administratively consolidated chapter 11 cases. The debtors sought bankruptcy to resolve \$1 million in pension fund withdrawal and contribution claims asserted by the Central States Southeast and Southwest Pension Fund arising after the debtors' collective bargaining agreement expired. Prior to filing, John negotiated the terms of the plan of reorganizations with the debtors' secured lender, which was memorialized in a plan support agreement. After extensive litigation with the Pension Fund, including an evidentiary hearing on confirmation of the plan of reorganization, the debtors' plan of reorganization was confirmed that provided a 13% payment to the Pension Fund.

Transactional Matters

Debt Restructure Transaction. During 2019, John assisted a small investment company restructure its debtor-party store's indebtedness. This matter involved the structuring, drafting, and closing (i) a redemption of stock held by the investment company in the party store and (ii) a release and exchange of collateral supporting the investment company's loan to the party store's affiliate.

Business Sale. During 2019, John represented a retiring fifty-percent member of an injection molding business, which serviced the automotive sector, sell his business interest, together with an interest in a related land holding company, to a strategic purchaser.

Member Unit Option Award. During 2018, John represented a spirits manufacturer with awarding a minority interest in the business to the second generation, which managed the retail and back office operations of the business. This engagement included substantially revising the business's limited liability company operating agreement and preparing a member unit option agreement.

Negotiation of Stock Investment. During 2018, John represented a potential investor into a software developer. During this engagement, John negotiated a stock subscription agreement, shareholder agreement, and warrant on behalf of the investor. The transaction did not close when the investor's due diligence was unsatisfactory.

Article 9 Acquisition of Auto Supplier. During 2018, John represented a private equity firm with acquiring the assets of a failing auto supplier. John analyzed various options to complete the proposed acquisition where the debtor-entity was cash poor and beset with judgment creditors. The acquisition of the business assets was accomplished under Article 9 of the Uniform Commercial Code, which allowed the senior lender to quickly foreclose upon and sell the auto supplier's assets to the private equity firm free and clear of junior liens. Additionally, John assisted with the private equity firm's purchase of the auto supplier's real estate through a special purpose entity and its acquisition of the underlying bank debt through a separate special purpose entity.

Business Debt and Industrial Property. During 2018, John assisted a real estate developer with the acquisition and sale of industrial real estate in Grand Rapids, Michigan. This engagement included, among other things, the formation of a single purpose acquisition entity, the purchase of a distressed loan and mortgage from a national bank, structuring and drafting loan and participation agreements to fund the note acquisition, and the preparation of a litigation strategy to obtain on the real estate. After exerting strategic pressure on the owners, John prepared, and the parties executed, a deed in lieu of foreclosure agreement transferring the industrial property to the acquisition vehicle. Shortly thereafter, John assisted the real estate developer sell the industrial real property at a significant profit.

Commercial Real Estate: John assisted the seller successfully close the sale of commercial property in Howell, Michigan in 2017.

Vacant Land. John assisted a non-profit purchaser acquire vacant land in Stockbridge, Michigan from a municipality in 2017.

Article 9 Sale of Truck Body Business: During late-2016, John assisted an aluminum truck-body manufacturer with analyzing various insolvency-related exit strategies. When management identified a purchaser, John worked with lender's counsel and purchaser's counsel to structure a transaction that could be closed quickly while minimizing the purchaser's exposure as a successor. As a result, the business was sold to the purchaser in a sale under Article 9 of the Uniform Commercial Code, whereby a debtor's assets are surrendered to the lender, who then sells them to the purchaser. Since the sale, the business has dissolved under state law.

Business Sale: During 2016, John assisted the seller of a deli-meat distributor to sell part of his business. This engagement involved the negotiation and drafting of purchase documents and seller financing documents.

Negotiation of Employment and Member Option Agreements. During 2015, John assisted a distressed oilfield company negotiate the sale of its business to special purpose vehicle owned by private equity. The transaction included negotiation of former equity's employment agreement including related member unit options in the acquirer as well as negotiation of the acquirer's LLC operating agreement.

OTHER DISTINCTIONS

Selected for inclusion in the *Michigan Super Lawyers*® list (2019-2020)

Selected for inclusion in the *Rising Stars*™ list (2009-2018)

Certificates of Merit – Thomas M. Cooley Law School, Bankruptcy, Business Organizations, Property I and II, Taxation, Criminal Law, Civil Procedure I and II, Wills Estates & Trusts, Tax of Business Entities, Torts I and II, and Securities Regulation

President's Achievement Award, 2008

Recipient: Association of Corporate Counsel Scholarship, 2008

Edward H. Rakow Award in Business and Securities Law, Eastern District of Michigan
Federal Bar Association, 2007

Associate Editor, *Thomas M. Cooley Law Review*

Distinguished Student Award, 2007

INTERESTS

In his spare time, John enjoys fishing, table-top gaming and finding and restoring antiques and automobiles.



Kim K. Hillary, Partner
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PRACTICES

Bankruptcy Litigation
Bankruptcy Reorganization
Commercial Law
Commercial Litigation

Ms. Hillary has been assisting debtors and creditors to minimize the disruption and negative impact of debtor insolvencies and to resolve commercial disputes for more than 15 years. Her experience and expertise allow her to formulate creative solutions for seemingly hopeless situations in order to drastically improve outcomes for her clients.

In addition to representing clients as a negotiator and litigator in a variety of commercial disputes, Ms. Hillary has represented small business and individual debtors in bankruptcies, lender workouts and out-of-court restructurings. Her Chapter 11 bankruptcy practice includes negotiating debtor financing and cash collateral orders, plans of reorganization, and the representation of Unsecured Creditor's Committees. She has also represented both debtors and creditors in all aspects of lender workouts, including negotiating and restructuring troubled debt, drafting forbearance agreements, complex loan agreements and documenting secured transactions.

ADMISSIONS

State Bar of Michigan, 2004

U.S. District Court, Eastern District of Michigan, 2004

U.S. District Court, Western District of Michigan, 2007

REPRESENTATIVE CASES

Beskroner v. Employee Health Ins. Mgmt., Inc. (In re Affirmative Ins. Holdings, Inc.), Case, No. 18-50296 (Bankr. D. Del. 2018) (lead counsel for defendant) (preference action successfully defended)

Collins v. Deshikachar (In re Deshikachar) (6th Cir. 2016) (co-lead counsel for *amicus curiae*, Mediation Panel of Bankr. E.D. Mich.) (debtor's appeal of order enforcing settlement agreement reached in mediation)

Cosby v. Baltrip (In re Baltrip) (Bankr. E.D. Mich. 2015) (lead bankruptcy counsel for wrongful death claimant) (two-year adversary proceeding for nondischargeability litigated to successful settlement)

Continental Surfaces of Pittsburgh, LLC (Bankr. W.D. Pa. 2015) (lead counsel for committee) (chapter 11 case converted to chapter 7)

In re Purtell (Bankr. E.D. Mich. 2015) (lead counsel for debtors) (chapter 11 for individual debtors with overwhelming tax debt)

Bay City Shovels, Inc. (Bankr. E.D. Mich. 2014) (lead counsel for debtor) (chapter 11 for manufacturer of catapults for aircraft carriers for the Department of Defense)

PUBLICATIONS

Turning Back The Hands Of Time With Chapter 11 Bankruptcy, Washtenaw County Bar Association, 48 Res Ipsa Loquitur 2, January 2019

We're From Bankruptcy And We REALLY Are Here To Help, Washtenaw County Bar Association, 47 Res Ipsa Loquitur 1, January/February 2018

Co-author, *Unforgiven No Longer: Ninth Circuit BAP Authorizes Discharge of Old Tax Debt from Untimely Returns*, 35 Am. Bankr. Inst. J. 7, July 2016 (cover story).

The Absence of Adverse Domination Statutes is Leaving an Exploitable Void in Corporate Law, Washtenaw County Bar Association, 46 Res Ipsa Loquitur 3, May/June 2016

Think You Know the Common Interest Privilege? Guess Again!, 36 Mich. Bus. L.J. 1 (official publication of the State Bar of Michigan), Spring 2016

Applying Claim Preclusion in Michigan: A Call for Clarity, 36 Mich. Bus. L.J. 1 (official publication of the State Bar of Michigan), Spring 2016

Hey Bank, Say it Ain't So!, Washtenaw County Bar Association, 45 Res Ipsa Loquitur 5, September/October 2015

The Absolute Priority Rule Should Not Apply to Individual Chapter 11 Debtors, 12 ABI Committee News - Bankruptcy Litigation Committee 21, July 2015

The Shell Game: Not a Game for Unwitting or Meek Creditors - Part II, Washtenaw County Bar Association 45 Res Ipsa Loquitur 2, March 2015

The Shell Game: Not a Game for Unwitting or Meek Creditors - Part I, Washtenaw County Bar Association 45 Res Ipsa Loquitur 2, January 2015

A California ABC Can Spell Trouble for Midwestern Creditors, Washtenaw County Bar Association 44 Res Ipsa Loquitur 6, November 2014

Co-author, *Expert Witnesses in Bankruptcy: Avoiding a Trap for the Unwary*, 34 Mich. Bus. L.J. 2 (official publication of the State Bar of Michigan), September 2014

Co-author, *When the New Sheriff Comes to Town: Michigan's Emergency Manager Law*, Turnaround Management Association, Journal of Corporate Renewal 16, June 2014

The Golden Age in Michigan's Homestead Exemption, Washtenaw County Bar Association 44 Res Ipsa Loquitur 3, May/June 2014

Section 547(c)(2)'s Industry Standard--In the Eighth Circuit, Whose Industry Is It?, 11 ABI Committee News - Unsecured Trade Creditors Committee 5, December 2013

In the Sixth Circuit, Landlords Beware!, 10 ABI Committee News - Real Estate Committee 4, December 2013

PROFESSIONAL MEMBERSHIPS

American Bankruptcy Institute

Downriver Bar Association

Flint Bay City Bankruptcy Association

Grand Valley State University Seidman College of Business Advisory Panel for Southeastern Michigan

Michigan State University College of Law Alumni Association Board of Directors

Northeast Michigan Bankruptcy Bar Association

State of Michigan Bar Association

Washtenaw County Bar Association

Wayne State University Wayne Biz Corporate Mentor Program

PRIOR EXPERIENCE

Law Clerk to Bankruptcy Judge Walter Shapero, E.D. Mich. – Detroit, 2012

Law Clerk to Bankruptcy Judge Daniel S. Opperman, E.D. Mich. – Bay City/Flint, 2011-2012

Law Clerk to Bankruptcy Judge Thomas J. Tucker, E.D. Mich. – Detroit, 2010-2011

Law Clerk to Chief Bankruptcy Judge Phillip J. Shefferly, E.D. Mich. – Detroit, 2010-2011

Bankruptcy Attorney for Trott & Trott, PC – Farmington Hills, 2009-2010

Extern to Bankruptcy Judge Walter Shapero, E.D. Mich. – Detroit, 2008

Extern to Chapter 13 Trustee Carl L. Bekofske – Flint, 2007A

HONORS & AWARDS

NCBJ Next Generation Program, Member

Glenn A. Niemeyer Award, Recipient



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PRACTICES

Bankruptcy Law
Business Litigation
Commercial Law
Debtor/Creditor Rights
Receiverships

Brandi focuses her practice on bankruptcy and restructuring, along with related debtor/creditor litigation. She successfully counsels and advises individuals and businesses on intricate issues under the Bankruptcy Code, Uniform Commercial Code, Uniform Voidable Transactions Act, and Fair Debt Collection Practices Act. Brandi has a great feel for litigation and uses her litigation skills to leverage great outcomes for her clients.

Brandi graduated from the University of Michigan Law School where she was a member of the Michigan Journal of Law Reform, the Michigan Mock Trial Team, and the Veterans Clinic. She holds a Bachelor of Science in Paralegal Studies from the University of Toledo.

Brandi also taught a bankruptcy course entitled, *Bankruptcy and Consumer Protection*, at the University of Toledo

ADMISSIONS & QUALIFICATIONS

State Bar of Michigan, 2019

U.S. District Court, Eastern District of Michigan, 2019

EDUCATION

University of Michigan Law School, J.D., cum laude, 2019

University of Toledo, 2016

PROFESSIONAL MEMBERSHIPS

State Bar of Michigan

Detroit Bar Association

American Bankruptcy Institute

OTHER DISTINCTIONS

Board Member, Turnaround Management Association

Board Member, Barrister's Section of Detroit Bar Association

Board Member, University of Toledo Advisory Board

INTERESTS

In her free time, Brandi enjoys martial arts, hiking and baking

EXHIBIT

7

SUMMARY OF COSTS AND EXPENSES INCURRED BY APPLICANT

EXPENSE	AMOUNT
Copies (0.20 cents/page)	164.60
Court Reporter	76.50
Federal Express	74.43
Postage	86.25
Research – PACER/LEXIS	2,373.95
UCC	6.00
Total	\$2,781.73

Additional Charges :

1/29/2021	\$Postage Service of Complaint	6.60
2/28/2021	\$Research Lexis Nexis	131.81
3/15/2021	\$EXP UCC Search	6.00
3/31/2021	\$EXP Pacer	453.63
6/22/2021	\$Court Reporter Transcript of Hearing on Zeidman's Motion to Dismiss	76.50
6/30/2021	\$Research Pacer	10.10

Page 101
Amount

7/1/2021	\$Research Lexis Nexis	191.90
7/31/2021	\$Research Lexis Nexis	6.91
9/21/2021	\$Copies (.20) email discovery	1.20
	\$Copies (.20) email discovery	1.80
	\$Copies (.20) email discovery	1.20
	\$Copies (.20) email discovery	1.80
	\$Copies (.20) email discovery	1.20
	\$Copies (.20) email discovery	1.20
	\$Copies (.20) email discovery	1.40
	\$Copies (.20) email discovery	3.20
	\$Copies (.20) email discovery	1.20
	\$Copies (.20) email discovery	2.00
	\$Copies (.20) email discovery	1.80
	\$Copies (.20) email discovery	2.20
	\$Copies (.20) email discovery	2.00

9/21/2021	\$Copies (.20) email discovery	2.00
	\$Copies (.20) email discovery	2.00
	\$Copies (.20) email discovery	1.80
	\$Copies (.20) email discovery	1.60
	\$Copies (.20) email discovery	1.60
	\$Copies (.20) email discovery	1.40
	\$Copies (.20) email discovery	2.60
	\$Copies (.20) email discovery	1.20
	\$Copies (.20) email discovery	2.40
	\$Copies (.20) email discovery	2.20
	\$Copies (.20) email discovery	2.00
	\$Copies (.20) email discovery	2.00
	\$Copies (.20) email discovery	1.80
	\$Copies (.20) email discovery	2.80
	\$Copies (.20) email discovery	1.20

9/21/2021	\$Copies (.20) email discovery	1.60
	\$Copies (.20) email discovery	1.60
	\$Copies (.20) email discovery	1.60
	\$Copies (.20) email discovery	1.40
	\$Copies (.20) email discovery	1.20
	\$Copies (.20) email discovery	1.20
	\$Copies (.20) email discovery	6.60
	\$Copies (.20) email discovery	1.20
	\$Copies (.20) email discovery	3.00
	\$Copies (.20) email discovery	1.20
9/22/2021	\$Copies (.20) email discovery	4.60
	\$Copies (.20) email discovery	4.60
	\$Copies (.20) email discovery	1.20
10/31/2021	\$Research Lexis Nexis	171.26
11/30/2021	\$Research Pacer	9.10

	Page 104
	<u>Amount</u>
11/30/2021 \$Research Pacer	1.40
\$Research Lexis Nexis	14.41
1/1/2022 \$Research Lexis Nexis	393.25
1/19/2022 \$Copies (.20) Zeidman's responses to Discovery	4.00
\$Copies (.20) Zeidman's responses to Discovery	16.80
\$Copies (.20) Zeidman's responses to Discovery	1.80
\$Copies (.20) Zeidman's responses to Discovery	6.40
\$Copies (.20) Zeidman's responses to Discovery	21.40
\$Copies (.20) Zeidman's responses to Discovery	6.40
\$Copies (.20) Zeidman's Discovery Response	4.80
1/31/2022 \$Research Pacer	3.30
\$Research Lexis Nexis	111.94
2/2/2022 \$FederalExpress	38.38
2/16/2022 \$Postage Serve Request to Admit, Interrogatories and Requests to Produce re: motion for adverse inference	2.56
2/18/2022 \$FederalExpress	36.05
2/28/2022 \$Research Lexis Nexis	26.93

3/8/2022	\$Postage Serve 2nd and 3rd Discovery Requests to Defendants	2.16
3/31/2022	\$Research Lexis Nexis	348.61
	\$Research Pacer	6.70
4/30/2022	\$Research Pacer	0.20
5/31/2022	\$Research Lexis Nexis	147.35
	\$Research Lexis Nexis	127.89
	\$Research Pacer	5.30
6/30/2022	\$Research Pacer	5.60
7/1/2022	\$Research Pacer	7.90
	\$Research Lexis Nexis	177.62
1/31/2023	\$Research Lexis Nexis	12.14
	\$Research Pacer	0.30
4/10/2023	\$Postage Mailing of Notice to Compromise	39.80
4/13/2023	\$Postage Motion to restrict public access of information to Joseph DuMouchelle Fine & Estate Jewelers	1.74
5/1/2023	\$Research Pacer	8.40

Page 106
Amount

7/19/2023 \$Copies (.20)	
Service of Notice Re: S & W's and Accountant's Fee Application	21.20
\$Postage	
Service of Notice Re: S & W's and Accountant's Fee Application	33.39
Total costs	<u>\$2,781.73</u>